

| COURTROOM EXPERIENCE | | |
|--|--|------------------------------------|
| <i>Court</i> | <i>Discipline</i> | <i>Number of Times</i> |
| District Court - Oklahoma County, Oklahoma | Questioned Documents | 57 |
| U.S. Federal Court - Western District - Oklahoma | Questioned Documents | 6 |
| District Court - Cleveland County, Oklahoma | Questioned Documents | 3 |
| District Court - Logan County, Oklahoma | Questioned Documents | 2 |
| District Court - Muskogee County, Oklahoma | Questioned Documents | 1 |
| District Court - Dewey County, Oklahoma | Questioned Documents | 1 |
| District Court - Clark County, Nevada | Questioned Documents | 15 |
| Justice Court - Clark County, Nevada | Questioned Documents | 2 |
| Grand Jury - Clark County, Nevada | Questioned Documents | 4 |
| US Federal - Clark County, Nevada | Questioned Documents | 5 |
| Justice Court - Clark County, Nevada | Footwear Impressions | 1 |
| District Court - Clark County, Nevada | Footwear Impressions | 3 |
| EMPLOYMENT HISTORY | | |
| <i>Employer</i> | <i>Job Title</i> | <i>Date</i> |
| Las Vegas Metropolitan Police Department | Questioned Document Examiner Footwear Impression Examiner | 08/97 - Present 02/07 - Present |
| Oklahoma County District Attorney Office - Oklahoma City, Oklahoma | Questioned Document Examiner | 03/86 - 07/97 |
| Oklahoma County District Attorney Office | White Collar Investigator | 11/79 - 03/86 |
| Ft. Smith Police Department | Patrol Officer | 08/76 - 11/79 |
| | | |
| PROFESSIONAL AFFILIATIONS | | |
| <i>Organization</i> | <i>Date(s)</i> | |
| Diplomat - American Board of Forensic Document Examiners - ABFDE | 06/93 - present | |

| PROFESSIONAL AFFILIATIONS | |
|---|----------------|
| Organization | Date(s) |
| Fellow-American Academy of Forensic Sciences - Questioned Document Section | 1990 - present |
| Active member-Southwest Association of Forensic Document Examiners-SWAFDE | 05/87 - 04/00 |
| American Standards and Testing Materials - ASTM | 1994 - 1996 |
| TWGDOC Subcommittee: Standardization for Procedures | 02/98 |
| Active member (moved from provisional member 8/00) of the American Society of Forensic Document Examiners (ASQDE) | 1998 - present |
| | |
| PUBLICATIONS / PRESENTATIONS: | |
| <i>Significant Dates of Typing Methods</i> - 62 page monograph published by ABFDE: released 1994 | |
| <i>Facsimile Documents: Feasibility for Comparison Purposes</i> , published in Journal of Forensic Sciences, November 1992, Vol. 37, No. 6, pp 1600 - 1609. | |
| <i>An Overview of Notary Public Laws and Practice</i> , presented to SWAFDE in Oakland, California, 1989. | |
| <i>Facsimile Documents: Feasibility for Comparison Purposes</i> , presented to the Questioned Document Section of the AAFS in Anaheim, California, 1991. | |
| <i>Significant Dates of Modern Typing Methods</i> , presented to the Questioned Document Section of the AAFS in Boston, Massachusetts, 1993. | |
| <i>Comparison of the Kinderprint to the ESDA</i> , presented to the Questioned Document Section of the AAFS in Boston, Massachusetts, 1993. | |
| <i>Photographic Techniques When Photographing Microfilm</i> , presented to SWAFDE in Albuquerque, New Mexico, 1993. | |
| <i>Factors To Consider in the Examination of Patients Writing</i> , presented to the Questioned Document Section of the AAFS in Seattle, Washington, 1995 | |
| <i>Patterns of Distinction</i> , presented at ASQDE on August 9, 1998 | |
| <i>The Examination of Disguised Numbers</i> , presented to AAFS Questioned Document Section in San Francisco, 1998 | |

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

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

PRESENT POSITION

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

PREVIOUS WORK EXPERIENCE

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

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

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

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

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Taylor Physicians-Van Born Clinic, P.C.
21711 Van Born Road
Taylor, Michigan
313-562-6040

June 1986 to January 1987

POSITION: Member of four physician group that renders primary care in the suburban Detroit area and trains family practice residents at Botsford General Hospital; hospital privileges at a 250 bed acute care hospital and a 125 bed acute care hospital; total patient contacts for period: 4500.

Michigan Health Care Center – Park Medical Centers, Inc.
2255 Fort Street
Lincoln Park, Michigan 48146
313-385-7505

January 1987 to June 1989

POSITION: Member of 60+ physician group that renders primary care in the Detroit and suburban area; hospital privileges at 250 bed acute care hospital; total patient contacts for period: 18,000.

Blodgett Memorial Medical Center
1840 Wealthy, S.E.
East Grand Rapids, Michigan 49506
616-774-7722

July 1, 1991 to January 30, 1993

POSITION: Independent contractor for autopsy services for in-house autopsies and Kent County Medical Examiner autopsies; completed approximately one hundred thirty autopsies on a fee-for-service basis.

Cook County Office of the Medical Examiner
Stein Institute of Forensic Medicine
2121 West Harrison Street
Chicago, Illinois 60612-3705
312-666-0500

July 1, 1994 to August 15, 1998

POSITION: Deputy Medical Examiner performing approximately 500-600 medico-legal investigations per year and testify 10-15 times per year.

BOARD STATUS

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

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

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

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LICENSES

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

EDUCATION

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

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

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

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

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

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

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

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University of Illinois at Chicago
Office of the Dean [MC 922]
School of Public Health
2121 West Taylor Street
Chicago, Illinois 60612-7260
312-966-3832

MAJOR: Health Policy Administration and Health Information Management
G.P.A.: 4.56 (5 point grading system)
DEGREE: Master of Public Health (M.P.H.)

ASSOCIATION MEMBERSHIPS

National Association of Medical Examiners

International Association of Coroners and Medical Examiners

PRESENTATIONS, LECTURES AND ACADEMIC CONTRIBUTIONS

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

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

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

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

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

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

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

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

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

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

LARY A. SIMMS, D.O., M.P.H.
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Database Information System for Tracking Unknown Bodies in a Medical Examiner System (1996 Office of the Medical Examiner staff lecture series presentation)

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

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

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

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

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

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

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

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

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

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

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

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

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

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ACADEMIC APPOINTMENTS, AWARDS AND ACTIVITIES

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

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

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

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

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

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

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

Advanced Trauma Life Support Certified, 1984

Advanced Cardiac Life Support Certified, 1983

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

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

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

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

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

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

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

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**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 07/26/10

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

Current Discipline of Assignment: Manager – Comparative Analysis Detail

| EXPERIENCE IN THE FOLLOWING DISCIPLINE(S) | | | |
|---|----------------|--------------------------------------|------------------|
| Controlled Substances | X | Blood Alcohol | X |
| Toolmarks | X | Breath Alcohol | X |
| Trace Evidence | | Arson Analysis | X |
| Toxicology | X | Firearms | X |
| Latent Prints | | Crime Scene Investigations | |
| Serology | | Clandestine Laboratory Response Team | X |
| Document Examination | | DNA Analysis | |
| Quality Assurance | | Technical Support / | |
| EDUCATION | | | |
| Institution | Dates Attended | Major | Degree Completed |
| Metropolitan State College | 8/79 - 5/84 | Criminalistics | BS |
| ADDITIONAL TRAINING / SEMINARS | | | |
| Course / Seminar | Location | Dates | |
| Ruger Factory Tour | Prescott, AZ | 03/19/10 | |
| Civilian Supervisory Development | Las Vegas, NV | 08/17-20/09 | |
| How to Supervise People | Las Vegas, NV | 10/15/09 | |
| Civilian Supervisory Development Part II | Las Vegas, NV | 10/28-29/09 | |
| Glock Armorer's Course | Las Vegas, NV | 06/03/08 | |
| Remington 870 Shotgun Armorer's Course | Las Vegas, NV | 05/05-05/06/08 | |
| SigSauer Armorer's Course-Semi-Auto Pistols | Las Vegas, NV | 07/02-07/03/08 | |
| AFTE 39 th Annual Training | Honolulu, HI | 05/18-23/08 | |
| Springfield Armory XD Armorer's Course | Las Vegas, NV | 01/31/08 | |

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

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

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

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

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

| COURTROOM EXPERIENCE | | |
|---|------------------------------|-----------------|
| Court | Discipline | Number of Times |
| Boulder City Municipal Court | Breath Alcohol/Blood Alcohol | 5 |
| Mesquite Municipal Court | Breath Alcohol | 9 |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| LVMPD Forensic Lab | Forensic Scientist I/II | 11/84 - present |
| United Parcel Service | Sorter/Loader | 8/81 - 10/84 |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |
| Northwest Association of Forensic Scientists | 1985 - present | |
| Clandestine Laboratory Investigating Chemists Association | 1995 - 2006 | |
| Association of Firearms and Toolmark Examiners | 2006 - present | |
| PUBLICATIONS / PRESENTATIONS: | | |
| 05/07 Hammer Forging of Rifle Barrels - Individuality of Barrels Forged from a Single Mandrel 2007 AFTE Training Seminar-San Francisco, CA | | |
| OTHER QUALIFICATIONS: | | |
| None | | |

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: TAYLOR, Erinmarie

P# 9619

Date: 03-26-13

| CURRENT CLASSIFICATION | | |
|------------------------------|---------------------------------|---|
| | <i>Classification</i> | <i>Minimum Qualifications</i> |
| | Crime Scene Analyst I | AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation. |
| | Crime Scene Analyst II | 18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I. |
| X | Senior Crime Scene Analyst | Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst. |
| | Crime Scene Analyst Supervisor | Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field. |
| FORMAL EDUCATION | | |
| <i>Institution</i> | <i>Major</i> | <i>Degree/Date</i> |
| Baylor University | Intro. to Blood Spatter Interp. | 24 Credit Hours |
| Public Agency Train. Council | Hostage Negotiation | 35 Credit Hours |
| Baylor University | Forensic Science | B.S. - May 15, 2004 |
| | | |
| | | |
| | | |
| TESTIMONY | | |
| <i>Yes</i> | <i>No</i> | |
| X | | District Court, Justice Court, Grand Jury |
| X | | U.S. District Court |
| EMPLOYMENT HISTORY | | |
| <i>Employer</i> | <i>Title</i> | <i>Date</i> |
| LVMPD | Senior CSA | 02-05-11 to Present |
| LVMPD | CSA II | 10-23-08 to 02-05-11 |
| LVMPD | CSA I | 10-23-06 to 10-23-08 |
| | | |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/24/10

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

Current Discipline of Assignment: Biology/DNA

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

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

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

| ADDITIONAL TRAINING / SEMINARS | | |
|--|-----------------------|--------------------------------|
| Course / Seminar | Location | Dates |
| Hair Analysis Training | Las Vegas, NV | 12/29-12/31/2008 |
| DNA Auditor Training | Hollywood, CA | 10/12-10/13/08 |
| 19 th International Symposium On Human Identification | Hollywood, CA | 10/12 - 10/16/08 |
| NFSTC Forensic Biology Screening Workshop | LVMPD | 10/15/07 - 10/19/07 |
| 18 th International Symposium on Human Identification | Los Angeles, CA | 10/07 |
| DNA Technology Expedition/Tour | Phoenix, AZ | 6/03, 6/06 |
| Future Trends in Forensic DNA Technology | Phoenix, AZ | 12/01, 10/02, 8/03, 9/04, 3/06 |
| 13 th -15 th International Symposium on Human Identification | Phoenix, AZ | October 2002, 2003, 2004 |
| Basic Bloodstain Pattern Identification hosted by MCSO | Phoenix, AZ | March 2004 |
| Courtroom Testimony Skills Workshop | Phoenix, AZ | January 2003 |
| Advanced 310 Genetic Analyzer Training | Foster City, CA | September 2001 |
| | | |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Clark County Justice Court | Seology/DNA | 1 |
| Clark County District Court | Serology/DNA | 4 |
| Clark County Grand Jury | Serology/DNA | 1 |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| Las Vegas Metro PD Forensic Lab | Forensic Scientist II | 5/07 - Present |
| AZ Dept of Public Safety | Criminalist II - DNA | 4/01 - 5/07 |
| | | |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |
| | | |
| | | |

| PROFESSIONAL AFFILIATIONS | |
|-------------------------------|---------|
| Organization | Date(s) |
| | |
| PUBLICATIONS / PRESENTATIONS: | |
| None | |
| | |
| OTHER QUALIFICATIONS: | |
| None | |
| | |

Curriculum Vitae

**Las Vegas Metropolitan Police Department: Criminalistics Bureau
Statement of Qualifications**

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

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

Formal Education:

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

Additional Classes and Training:

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

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 07/01/10

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

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)

| | | | |
|-----------------------|---|--------------------------------------|---|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | |
| Latent Prints | | Crime Scene Investigations | |
| Serology | X | Clandestine Laboratory Response Team | |
| Document Examination | | DNA Analysis | X |
| Footwear Impressions | | Technical Support / | |
| Quality Assurance | | | |

EDUCATION

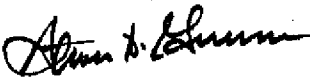
| <i>Institution</i> | <i>Dates Attended</i> | <i>Major</i> | <i>Degree Completed</i> |
|-------------------------------------|-----------------------|------------------------|-------------------------|
| University of Central Florida | 01/2005-present | Anthropology | BA-in progress |
| Minnesota State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

ADDITIONAL TRAINING / SEMINARS

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

| ADDITIONAL TRAINING / SEMINARS | | |
|--|--------------------------|--------------------|
| Course / Seminar | Location | Dates |
| Statewide Biology Discipline Meeting | Largo, FL | 05/14/08-05/15/08 |
| Florida Statewide DNA Conference | Largo, FL | 05/12/08-05/13/08 |
| 3130 HID Class by Applied Biosystems | Orlando, FL | 05/01/07-05/03/07 |
| Serology/DNA Crime Laboratory Analyst Training Program | Orlando, FL | 06/2006-06/2007 |
| 7000/7500 Sequence Detection Systems Training | Orlando, FL | 10/19/06 |
| Blomex 2000/3000 Training | Orlando, FL | 09/25/06 |
| GeneMapper ID Computer Software Training | Orlando, FL | 09/2006 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Orange, Brevard, Osceola, Seminole and Volusia Counties, Florida | Serology/DNA | 15 |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| Las Vegas Metropolitan Police Department | Forensic Scientist II | 06/14/2010-present |
| Florida Department of Law Enforcement | Crime Laboratory Analyst | 04/2006-05/28/2010 |
| Florida Department of Law Enforcement | Forensic Technologist | 12/31/05-04/2006 |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |
| American Academy of Forensic Sciences | 01/2006-present | |
| International Association for Identification | 06/2004-present | |
| PUBLICATIONS / PRESENTATIONS: | | |
| University of Central Florida -- Introductory Forensic Science Class presentation 03/24/2010 | | |
| Detective Training presentation -- DNA Training For New Detectives 10/2009 | | |
| OTHER QUALIFICATIONS: | | |
| | | |

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CLERK OF THE COURT

OPPS

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

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,
Plaintiff,

-vs-

MATTHEW WASHINGTON,
#2685499
MARTELL MOTEN
#1999333

Defendants.

CASE NO: C-13-294695-1

DEPT NO: XI

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

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

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

//

1 This opposition is made and based upon all the papers and pleadings on file herein,
2 the attached points and authorities in support hereof, and oral argument at the time of
3 hearing, if deemed necessary by this Honorable Court.

4 **POINTS AND AUTHORITIES**

5 **STATEMENT OF THE CASE**

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

14 Additionally, the State of Nevada filed an Amended Criminal Complaint in open
15 court charging Defendants with one (1) count of Conspiracy to Commit Murder with the
16 Intent to Promote, Further or Assist a Criminal Gang, one (1) count of Murder with use of a
17 Deadly Weapon, with the Intent to Promote, Further or Assist a Criminal Gang, three (3)
18 counts of Attempt Murder with use of a Deadly Weapon, with the Intent to Promote, Further
19 or Assist a Criminal Gang, two (2) counts of Battery with Use of a Deadly Weapon
20 Resulting in Substantial Bodily Harm with the Intent to Promote, Further or Assist a
21 Criminal Gang, and ten (10) counts of Discharging a Firearm at or Into a Structure with the
22 Intent to Promote, Further or Assist a Criminal Gang and one (1) count of Possession of
23 Firearm by Ex Felon. A preliminary hearing was set for December 5, 2013. On December
24 5, 2013, the State started its presentation of evidence. The Court continued the preliminary
25 hearing until December 9, 2013. On December 9, 2013, the State finished its presentation of
26 probable cause. Defendants were bound over to District Court on all charges without the
27 gang enhancement and without substantial bodily injury to one of the counts.

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

11 THE STATEMENT OF THE FACTS

12 On November 5, 2013, just after 4:30 AM, approximately ten (10) shots were fired
13 into the residence of 2655 Sherwood Street, Apt #18. The multiple shots left three (3)
14 victims still breathing – Laroy Thomas, Marque Hill and Ashley Scott. Of the three (3), two
15 (2) Laroy Thomas and Ashley Scott sustained gunshot wounds to their ankle areas. The
16 fourth victim, Nathan Rawls, was killed by the gunshot wound that hit his chest. Rawls was
17 found dead by the couch in the living room area. The apartment was riddled with bullet
18 holes. On November 5, 2013, at approximately 4:30AM, Lorraine Desoto, was in the area of
19 2655 Sherwood Street and was awoken by gunfire. Desoto got up, got dressed, looked out
20 the window and saw a vehicle. The vehicle was in an alley. The vehicle was a silver Dodge
21 Magnum. The silver Dodge Magnum was driving west toward Van Patten. Desoto then
22 called 911. Later that day police took Desoto to a location where she identified the silver
23 Dodge Magnum as the vehicle she saw leave the alley.

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

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

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

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

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

24 ARGUMENT

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

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

6 The decision to sever is left to the discretion of the trial court and such decision will
7 not be reversed absent an abuse of discretion. Amen v. State, 106 Nev. 749, 801 P.2d 1354
8 (1990). Broad allegations of prejudice are not enough to require a trial court to grant
9 severance. United States v. Baker, 10 F.3d 1374, 1389 (9th Cir. 1993), cert. denied, 513
10 U.S. 934, 115 S. Ct. 330 (1994), overruled on other grounds by United States v. Nordby, 225
11 F.3d 1053 (9th Cir. 2000). Finally, even if prejudice is shown, the trial court is not required
12 to sever; rather, it must grant relief tailored to alleviate the prejudice. See, e.g., Zafiro v.
13 United States, 506 U.S. 534, 540-41, 113 S. Ct. 933, 939 (1993).

14 Within the federal system, and specifically the Ninth Circuit, the presumption is
15 heavily in favor of joint trials. "[C]o-defendants jointly charged, are, prima facie, to be
16 jointly tried." United States v. Gay, 567 F.2d 916, 919 (9th Cir.), cert. denied, 435 U.S. 999,
17 98 S. Ct. 1655 (1978); United States v. Silla, 555 F.2d 703, 707 (9th Cir. 1977) ("compelling
18 circumstances" are generally necessary to show need for separate trials). The trial court has
19 the broad discretion to join or sever trials and severance is not required unless a joint trial
20 would be manifestly prejudicial. See Gay, 567 F.2d at 919. Federal appellate courts review
21 a denial of a motion to sever for abuse of discretion and "[t]o satisfy this heavy burden, an
22 appellant must show that the joint trial was so prejudicial as to require the exercise of the
23 district judge's discretion in only one way: by ordering a separate trial." United States v.
24 Ford, 632 F.2d 1354, 1373 (9th Cir. 1980), cert. denied, 450 U.S. 934, 101 S. Ct. 1399
25 (1981), overruled on other grounds by United States v. DeBright, 730 F.2d 1255 (9th Cir.
26 1984).

27 //

28 //

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

10 **Severance is NOT Required based on Bruton Concerns.**

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

20 In fact, redaction is not per se barred. Specifically, in People v. Fletcher, 13 Cal.4th
21 451, 917 P.2d 187 (1996), the holding states the following:

22 We hold, therefore, that editing a non testifying codefendant's extrajudicial
23 statement to substitute pronouns or similar neutral terms for the defendant's
24 name will not invariably be sufficient to avoid violation of the defendant's
25 Sixth Amendment confrontation rights. Rather, the sufficiency of this form of
26 editing must be determined on a case-by-case basis in light of the statement as
27 a whole and the other evidence presented at the trial. Fletcher, at 582, 197.
28

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

10 **Antagonistic Defenses do NOT require Severance.**

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

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

24 Severance is not warranted or justified simply because each defendant seeks to blame
25 the other for the crime. Marshall v. State, 118 Nev. 642, 56 P.3d 376 (2002). In Marshall,
26 co-defendants Marshall and Currington were tried and convicted together of first degree
27 murder, robbery, and conspiracy to commit robbery. At trial, Marshall's strategy was to
28

1 exclusively blame Currington; Currington's strategy was to blame Marshall. Id. at 644-45,
2 56 P.3d at 377-78.

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

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

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

23 The Court then explained the standard for severance.

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

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

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

28 //

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

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

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

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

4 The decision in United States v. Mayfield, 189 F.3d 895 (9th Cir. 1999) reinforces the
5 ability of the court to mitigate any risks of prejudice in a joint trial. Id., 189 F.3d 895 (9th
6 Cir. 1999). In Mayfield, defendants Mayfield and Gilbert were jointly tried for possession
7 with intent to distribute cocaine. On appeal, the Ninth Circuit reversed Mayfield's
8 conviction. Significantly, the reviewing court did not hold that reversal was necessary
9 simply because the defendants had antagonistic defenses. Rather, the circuit court
10 concluded that reversal was necessary because the trial court failed to protect Mayfield's
11 rights when it gave Gilbert's counsel "free rein to introduce evidence against Mayfield" and
12 act as a second prosecutor and did not remedy the trial tactics of Gilbert's attorney by
13 severance "or some alternative means of mitigating the substantial risk of prejudice." Id. at
14 897.

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

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

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

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

22 Chartier v. State, 124 Nev. 760, 191 P.3d 1182 (2008), cited to by the defense, does
23 not change this analysis. In that case, the Nevada Supreme Court held that the cumulative
24 effect of the joint trial was not harmless because it had an injurious effect on the verdict as
25 demonstrated by the conflicting and irreconcilable defenses in the case. *Id.* 191 P.3d at
26 1186. The reversal was not based simply on the fact that the defendants blamed each other
27 for the crime. The Chartier case did not overturn the Court's decision in Marshall. 191 P.3d
28 at 1186. Rather, the Court distinguished Chartier from Marshall by highlighting how

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

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

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

16 CONCLUSION

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

19 DATED this 17th day of January, 2014.

20 Respectfully submitted,

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

24 BY /s//BARBARA SCHIFALACQUA
25 BARBARA SCHIFALACQUA
26 Chief Deputy District Attorney
27 Nevada Bar #10436
28

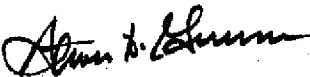
CERTIFICATE OF ELECTRONIC FILING

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

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

Shellie Warner
Secretary for the District Attorney's Office

mmw/GANG


CLERK OF THE COURT

1 **NOTC**

2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 DANIELLE K. PIEPER
6 Chief Deputy District Attorney
7 Nevada Bar #008610
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA,
13
14 Plaintiff,

15 -vs-

16 MATTHEW WASHINGTON,
17 #2685499

18 Defendant.

CASE NO: C-13-294695-1

DEPT NO: VI

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

21 TO: MATTHEW WASHINGTON, Defendant; and

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

23 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the STATE OF
24 NEVADA intends to call the following witnesses in its case in chief:

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

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

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

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

***Indicates an additional witness**

| 1 | <u>NAME</u> | <u>ADDRESS</u> |
|----|--|----------------------------|
| 2 | ADAMS, TIFFANY - LVMPD P#10072 (or designee): | Expert in the field of DNA |
| 3 | extractions, comparisons, analysis, and the identification of bodily fluids and is expected to | |
| 4 | testify thereto. | |
| 5 | AOYAMA, KATHRYN - LVMPD P#8025 (or designee): LATENT PRINT EXAMINER - | |
| 6 | Expert in the science and techniques of fingerprint comparison, and comparisons done in this | |
| 7 | case and any reports prepared therefrom. | |
| 8 | *ARCINIEGA, D. - LVMPD P#14185 | |
| 9 | BAS, JENNIFER - LVMPD P#9944 (or designee): Expert in the field of DNA extractions, | |
| 10 | comparisons, analysis, and the identification of bodily fluids and is expected to testify | |
| 11 | thereto. | |
| 12 | BEAUDETTE, FRAN - LVMPD P#4361 (or designee): Expert in the field of DNA | |
| 13 | extractions, comparisons, analysis, and the identification of bodily fluids and is expected to | |
| 14 | testify thereto. | |
| 15 | BENINCASA, FLOCERFIDA - LVMPD P#10170 (or designee): Expert in the field of | |
| 16 | DNA extractions, comparisons, analysis, and the identification of bodily fluids and is | |
| 17 | expected to testify thereto. | |
| 18 | *BRANDON, J. - LMVPD 9631 | |
| 19 | *BRISENDINE, D. - LVMPD P#14003 | |
| 20 | *BUNTING, C. - LVMPD P#6484 | |
| 21 | CAMERON, CATHRYN - LVMPD P#9887 (or designee): LATENT PRINT EXAMINER I | |
| 22 | - Expert in the science and techniques of fingerprint comparison, and comparisons done in | |
| 23 | this case and any reports prepared therefrom. | |
| 24 | CARTER, MARNIE - LVMPD P#8179 (or designee): LATENT PRINT EXAMINER II - | |
| 25 | Expert in the science and techniques of fingerprint comparison, and comparisons done in this | |
| 26 | case and any reports prepared therefrom. | |
| 27 | *CHARLTON, N. - LVMPD P#13572 | |
| 28 | *COPLEY, B. - LVMPD P#14462 | |

1 CROMWELL, MICHAEL – LVMPD P#13203 (or designee): CRIME SCENE ANALYST:
2 Expert in the identification, documentation, collection and preservation of evidence and is
3 expected to testify as an expert to the identification, documentation, collection and
4 preservation of the evidence in this case.
5 CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER
6 CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS
7 CUSTODIAN OF RECORDS – LVMPD RECORDS
8 *DARBOWSKI, J. - C/O CCDA, 200 LEWIS AVE., LVN 89101
9 *DARR, A. - LVMPD P#5485
10 DESOTO, DARRIN – 2635 SHERWOOD ST., #18, LVN 89109
11 *DOBLE, N. - LVMPD P#8298
12 *DONOVAN, M. - LVMPD P#13241
13 *DREDLA, M. - LVMPD P#8049
14 *FIGUORA, J. - C/O SUNRISE HOSPITAL
15 FINK, JAMES – LVMPD P#4780
16 *FORNI, GARRETT - LVMPD P#14080
17 FRIED, JONATHAN – LVMPD P#8174 (or designee): FIREARMS/TOOLMARK
18 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
19 field of firearm and toolmark comparisons and is expected to testify thereto.
20 GAUTHIER, KELLIE – LVMPD P#8691 (or designee): Expert in the field of DNA
21 extractions, comparisons, analysis, and the identification of bodily fluids and is expected to
22 testify thereto.
23 *GOLLMER, J. - LVMPD P#13429
24 GOULDTHORPE, HEATHER – LVMPD P#8646 (or designee): LATENT PRINT
25 EXAMINER I - Expert in the science and techniques of fingerprint comparison, and
26 comparisons done in this case and any reports prepared therefrom.
27 *GRAMMAS, KRISTIN K. - LVMPD P#7808 (or designee): CRIME SCENE ANALYST:
28 Expert in the identification, documentation, collection and preservation of evidence and is

1 expected to testify as an expert to the identification, documentation, collection and
2 preservation of the evidence in this case.
3 GUENTHER, EDWARD – LVMPD P#5891 (or designee): LATENT PRINT EXAMINER -
4 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
5 case and any reports prepared therefrom.
6 HAINES, LORI – LVMPD P#9931 (or designee): LATENT PRINT EXAMINER II -
7 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
8 case and any reports prepared therefrom.
9 HILL, MARQUE – 2655 SHERWOOD ST., #18, LVN 89109
10 HONAKER, JAMIE – DISTRICT ATTORNEY INVESTIGATOR
11 *HUFF, C. - LVMPD P#8888
12 JOHNSON, DAVID – LVMPD P#9933 (or designee): LATENT PRINT EXAMINER II -
13 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
14 case and any reports prepared therefrom.
15 *KELVINGTON, A. - LVMPD P#8878
16 KING, CRAIG – LVMPD P#9971 (or designee): Expert in the field of DNA extractions,
17 comparisons, analysis, and the identification of bodily fluids and is expected to testify
18 thereto.
19 KRYLO, JAMES – LVMPD P#5945 (or designee): FIREARMS/TOOLMARK
20 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
21 field of firearm and toolmark comparisons and is expected to testify thereto.
22 LESTER, ANYA “SANKO” – LVMPD P#13771 (or designee): FIREARMS/TOOLMARK
23 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
24 field of firearm and toolmark comparisons and is expected to testify thereto.
25 *LIVELY, JAMES - C/O CCDA, 200 LEWIS AVE., LVN 89101
26 *LYNCH, M. - LVMPD P#8284
27 LYNCH, SHANDRA – LVMPD P#13206 (or designee): CRIME SCENE ANALYST II:
28 Expert in the identification, documentation, collection and preservation of evidence and is

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

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

6 MARSCHNER, JULIE – LVMPD P#8806 (or designee): Expert in the field of DNA
7 extractions, comparisons, analysis, and the identification of bodily fluids and is expected
8 MARTIN, TERRY – LVMPD P#5946 (or designee): CRIME SCENE ANALYST: Expert
9 in the identification, documentation, collection and preservation of evidence and is expected
10 to testify as an expert to the identification, documentation, collection and preservation of the
11 evidence in this case.

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

15 MCCARTHY, JASON – LVMPD P#4715

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

20 *MCGUIRE, J. - LVMPD P#14067

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

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

28 //

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

4 *NARVARRO, B. - LVMPD P#12616

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

9 *OSTROVSKY, S. - LVMPD P#13902

10 PAIQUETTE, C. - LVMPD P#13937

11 RAETZ, DEAN - LVMPD P#4234

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

15 REVELS, JEROME - DISTRICT ATTORNEY INVESTIGATOR

16 ROGERS, R. - LVMPD P#2858

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

20 SCOTT, ASHLEY - 2645 SHERWOOD ST., #11, LVN 89109

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

24 SHELL, ELIZABETH - 1918 PINEDALE AVE., MEMPHIS, TN 38127

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

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

5 *SOKOLOWSKI, E. - LVMPD P#14190

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

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

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

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

20 THOMAS, LAROY - 2655 SHERWOOD ST., #18, LVN 89109
21 to testify thereto.

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

25 //

26 //

27 //

28 //

1 WATTS, JOE - DISTRICT ATTORNEY INVESTIGATOR

2 *WEBER, D. - LVMPD P#14457

3 STEVEN B. WOLFSON
4 District Attorney
5 Nevada Bar #001565

6 BY /s//DANIELLE K. PIEPER
7 DANIELLE K. PIEPER
8 Chief Deputy District Attorney
9 Nevada Bar #008610

10 **CERTIFICATE OF ELECTRONIC FILING**

11 I hereby certify that service of State's Notice, was made this 6th day of January, 2014,

12 by Electronic Filing to:

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

15 Shellie Warner
16 Secretary for the District Attorney's Office

17
18
19
20
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26
27
28 mmw/GANG

LAS VEGAS CRIMINALISTICS BUREAU

STATEMENT OF QUALIFICATIONS

Name: Kristin K. Grammas

P# 7808

Date: 8/14/03

| CURRENT CLASSIFICATION | | |
|------------------------|--------------------------------|--|
| | CLASSIFICATION | MINIMUM QUALIFICATIONS |
| X | Crime Scene Analyst I | AA degree with major course work in criminal justice, forensic science, physical science or related field, including specialized training in crime scene investigation |
| | Crime Scene Analyst II | 18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I |
| | Senior Crime Scene Analyst | 2 years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst |
| | Crime Scene Analyst Supervisor | 4 years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a bachelor's degree from an accredited college or university with major course work in criminal justice, forensic science, physical science or related field. |

| FORMAL EDUCATION | | |
|------------------|--|-------------|
| Institution | Major | Degree/Date |
| CCSN and UNLV | Major Course Work in Criminal Justice and Anthropology | |

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

| EMPLOYMENT HISTORY | | |
|-------------------------------------|-------|----------|
| Employer | Title | Date |
| LVMPD - Criminalistics Bureau/Field | CSA I | 08/12/02 |

Curriculum Vitae
JEFFREY SMINK

Name: SMINK, Jeffery

P# 6556

Date: 06-05-00

CURRENT CLASSIFICATION

| Classification | Minimum Qualifications |
|---|---|
| <input checked="" type="checkbox"/> CRIME SCENE ANALYST I | AA DEGREE WITH MAJOR COURSE WORK IN CRIMINAL JUSTICE, FORENSIC SCIENCE, PHYSICAL SCIENCE OR RELATED FIELD, INCLUDING SPECIALIZED TRAINING IN CRIME SCENE INVESTIGATION. |
| <input type="checkbox"/> CRIME SCENE ANALYST II | EIGHTEEN (18) MONTHS - TWO (2) YEARS CONTINUOUS SERVICE WITH LVMPD AS A CRIME SCENE ANALYST I. |
| <input type="checkbox"/> SENIOR CRIME SCENE ANALYST | TWO (2) YEARS AS A CRIME SCENE ANALYST II TO QUALIFY FOR THE PROMOTIONAL TEST FOR SENIOR CRIME SCENE ANALYST. |
| <input type="checkbox"/> CRIME SCENE ANALYST SUPERVISOR | FOUR (4) YEARS CONTINUOUS SERVICE WITH LVMPD AND COMPLETION OF PROBATION AS A SENIOR CRIME SCENE ANALYST. MUST HAVE THE EQUIVALENT OF A BACHELOR'S DEGREE FROM AN ACCREDITED COLLEGE OR UNIVERSITY WITH MAJOR COURSE WORK IN CRIMINAL JUSTICE, FORENSIC SCIENCE, PHYSICAL SCIENCE OR RELATED FIELD. |

FORMAL EDUCATION

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

TESTIMONY

| Yes | No | |
|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | San Bernardino County, CA - Juvenile, Municipal, Superior |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | LA County, CA - Superior, Federal Court, Los Angeles, CA |

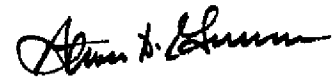
EMPLOYMENT HISTORY

| Employer | Title | Date |
|---|------------------------|--------------------------------|
| San Bernardino County Sheriff - Scientific Invest. <small>Division</small> | Forensic Specialist II | 12- <small>88/89</small> |
| San Bernardino County Sheriff - Identification <small>Division</small> | Evidence Clerk | 06-86/11- <small>87</small> |

JEFFERY SMINK
Curriculum Vitae
Page - 1 -

| | | |
|--|----------------|--|
| | | |
| PROFESSIONAL AFFILIATIONS | | |
| <i>Organization</i> | <i>Date(s)</i> | |
| International Association for Identification - California and Nevada State Divisions | 1998 | |
| Association of Crime Reconstruction | 1998 | |
| International Association for Identification - National | 2000 | |

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CLERK OF THE COURT

1 **NOTC**

2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 DANIELLE K. PIEPER
6 Chief Deputy District Attorney
7 Nevada Bar #008610
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,

Plaintiff,

11 -vs-

12 MATTHEW WASHINGTON,
13 #2685499

Defendant.

CASE NO: C-13-294695-1

DEPT NO: XI

14 **SECOND SUPPLEMENTAL NOTICE OF WITNESSES**
15 **AND/OR EXPERT WITNESSES**
16 **[NRS 174.234]**

17 TO: MATTHEW WASHINGTON, Defendant; and

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

19 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the STATE OF
20 NEVADA intends to call the following witnesses in its case in chief:

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

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

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

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

28 ***Indicates an additional witness**

| 1 | <u>NAME</u> | <u>ADDRESS</u> |
|----|--|---|
| 2 | ADAMS, TIFFANY - LVMPD P#10072 (or designee): | Expert in the field of DNA |
| 3 | extractions, comparisons, analysis, and the identification of bodily fluids and is expected to | |
| 4 | testify thereto. | |
| 5 | AOYAMA, KATHRYN - LVMPD P#8025 (or designee): LATENT PRINT EXAMINER - | |
| 6 | Expert in the science and techniques of fingerprint comparison, and comparisons done in this | |
| 7 | case and any reports prepared therefrom. | |
| 8 | *ARCHER, ANTHONY - LVMPD P#6403 | |
| 9 | ARCINIEGA, D. - LVMPD P#14185 | |
| 10 | BAS, JENNIFER - LVMPD P#9944 (or designee): | Expert in the field of DNA extractions, |
| 11 | comparisons, analysis, and the identification of bodily fluids and is expected to testify | |
| 12 | thereto. | |
| 13 | BEAUDETTE, FRAN - LVMPD P#4361 (or designee): | Expert in the field of DNA |
| 14 | extractions, comparisons, analysis, and the identification of bodily fluids and is expected to | |
| 15 | testify thereto. | |
| 16 | *BECHLER, MICHAEL - LVMPD P#4701 | |
| 17 | *BECK, K. - LVMPD P#9629 | |
| 18 | *BELL, L. - LVMPD P#13591 | |
| 19 | *BELLO, GERARD - LVMPD P#6793 | |
| 20 | BENINCASA, FLOCERFIDA - LVMPD P#10170 (or designee): | Expert in the field of |
| 21 | DNA extractions, comparisons, analysis, and the identification of bodily fluids and is | |
| 22 | expected to testify thereto. | |
| 23 | *BIDDLE, DAWN - 9540 AMBER VALLEY, LVN 89134 | |
| 24 | *BLOUNT, DANIEL - LVMPD P#8287 | |
| 25 | BRANDON, J. - LMVPD 9631 | |
| 26 | BRISENDINE, D. - LVMPD P#14003 | |
| 27 | BUNTING, C. - LVMPD P#6484 | |
| 28 | *BUTLER, WENDY - LVMPD P#8720 | |

1 CAMERON, CATHRYN – LVMPD P#9887 (or designee): LATENT PRINT EXAMINER I
2 - Expert in the science and techniques of fingerprint comparison, and comparisons done in
3 this case and any reports prepared therefrom.
4 *CAMPBELL, T. – KOHL'S – 4250 BLUE DIAMOND, LVN
5 *CAMPBELL, T. – LVMPD P#13402
6 CARTER, MARNIE – LVMPD P#8179 (or designee): LATENT PRINT EXAMINER II -
7 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
8 case and any reports prepared therefrom.
9 CHARLTON, N. - LVMPD P#13572
10 *CLARKSON, CASEY - LVMPD P#9170
11 *COOK, DARIN - LVMPD P#5730
12 COPLEY, B. - LVMPD P#14462
13 CROMWELL, MICHAEL – LVMPD P#13203 (or designee): CRIME SCENE ANALYST:
14 Expert in the identification, documentation, collection and preservation of evidence and is
15 expected to testify as an expert to the identification, documentation, collection and
16 preservation of the evidence in this case.
17 CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER
18 *CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER INTEL
19 CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS
20 CUSTODIAN OF RECORDS – LVMPD RECORDS
21 *CUSTODIAN OF RECORDS – NEVADA DEPT. OF MOTOR VEHICLES
22 *CUSTODIAN OF RECORDS – SHERWOOD PALMS, 2645 SHERWOOD, LVN
23 DARBOWSKI, J. - C/O CCDA, 200 LEWIS AVE., LVN 89101
24 DARR, A. - LVMPD P#5485
25 DESOTO, DARREN – 2635 SHERWOOD ST., #18, LVN 89109
26 *DESOTO, LORRAINE – 2635 SHERWOOD ST., #18, LVN 89109
27 DOBLE, N. - LVMPD P#8298
28 DONOVAN, M. - LVMPD P#13241

1 DREDLA, M. - LVMPD P#8049
2 *DUKE, JUSTIN - LVMPD P#13934
3 *EDDINGTON, M. - LVMPD P#14206
4 *EDWARDS, T. - LVMPD P#9035
5 *FELLIG, D. - NLVPD P#2194
6 *FERGUSON, P. - LVMPD P#7469
7 FIGUORA, J. - C/O SUNRISE HOSPITAL
8 FINK, JAMES - LVMPD P#4780
9 FORNI, GARRETT - LVMPD P#14080
10 *FRAZIER, A. - LVMPD P#9152
11 FRIED, JONATHAN - LVMPD P#8174 (or designee): FIREARMS/TOOLMARK
12 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
13 field of firearm and toolmark comparisons and is expected to testify thereto.
14 GAUTHIER, KELLIE - LVMPD P#8691 (or designee): Expert in the field of DNA
15 extractions, comparisons, analysis, and the identification of bodily fluids and is expected to
16 testify thereto.
17 *GILLIS, M. - LVMPD P#6432
18 GOLLMER, J. - LVMPD P#13429
19 *GOMEZ, JUAN - 3400 CABANA DRIVE, # 1050, LVN 89122
20 GOULDTHORPE, HEATHER - LVMPD P#8646 (or designee): LATENT PRINT
21 EXAMINER I - Expert in the science and techniques of fingerprint comparison, and
22 comparisons done in this case and any reports prepared therefrom.
23 GRAMMAS, KRISTIN K. - LVMPD P#7808 (or designee): CRIME SCENE ANALYST:
24 Expert in the identification, documentation, collection and preservation of evidence and is
25 expected to testify as an expert to the identification, documentation, collection and
26 preservation of the evidence in this case.
27 *GRUNWALD, JAKE - LVMPD P#9041
28 //

1 GUENTHER, EDWARD – LVMPD P#5891 (or designee): LATENT PRINT EXAMINER -
2 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
3 case and any reports prepared therefrom.
4 *GUERRA, J. - LVMPD P#8780
5 HAINES, LORI – LVMPD P#9931 (or designee): LATENT PRINT EXAMINER II -
6 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
7 case and any reports prepared therefrom.
8 *HALASI, RYAN - LVMPD P#8793
9 *HARRIS, F. - LVMPD P#12940
10 *HARRIS, N. – NLVPD P#1962
11 *HEITZENRATER, J. – NLVPD P#2029
12 *HEMPHILL, JOSEPH - LVMPD P#9061
13 HILL, MARQUE – 2655 SHERWOOD ST., #18, LVN 89109
14 *HODSON, B. - LVMPD P#9034
15 *HOGAN, A. - LVMPD P#8279
16 *HOLSTEIN, D. – LVMPD P#3861
17 HONAKER, JAMIE – DISTRICT ATTORNEY INVESTIGATOR
18 HUFF, C. - LVMPD P#8888
19 *HUTCHASON, S. - LVMPD P#7088
20 *IZZO, SHAWN - LVMPD P#9319
21 *JACKSON, ALVIN – ADDRESS UNKNOWN
22 *JACKSON, QUAMAE – 4800 E. TROPICANA, APT. 1021, LVN 89121
23 *JAHN, PETER - LVMPD P#7461
24 JOHNSON, DAVID – LVMPD P#9933 (or designee): LATENT PRINT EXAMINER II -
25 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
26 case and any reports prepared therefrom.
27 *JONES, LESLIE – ADDRESS UNKNOWN
28 *JONES, N. - LVMPD P#9043

1 KELVINGTON, A. - LVMPD P#8878
2 KING, CRAIG - LVMPD P#9971 (or designee): Expert in the field of DNA extractions,
3 comparisons, analysis, and the identification of bodily fluids and is expected to testify
4 thereto.
5 KRYLO, JAMES - LVMPD P#5945 (or designee): FIREARMS/TOOLMARK
6 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
7 field of firearm and toolmark comparisons and is expected to testify thereto.
8 *LAMOTHE, JOSHUA - LVMPD P#9364
9 *LEBLANC, B. - LVMPD P#7316
10 LESTER, ANYA "SANKO" - LVMPD P#13771 (or designee): FIREARMS/TOOLMARK
11 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
12 field of firearm and toolmark comparisons and is expected to testify thereto.
13 LIVELY, JAMES - C/O CCDA, 200 LEWIS AVE., LVN 89101
14 *LOPEZ-MATOS, YAON - 6500 VEGAS DR., LVN 89108
15 LYNCH, M. - LVMPD P#8284
16 LYNCH, SHANDRA - LVMPD P#13206 (or designee): CRIME SCENE ANALYST II:
17 Expert in the identification, documentation, collection and preservation of evidence and is
18 expected to testify as an expert to the identification, documentation, collection and
19 preservation of the evidence in this case.
20 MACEO, ALICE - LVMPD P#7828 (or designee): LATENT PRINT EXAMINER - Expert
21 in the science and techniques of fingerprint comparison, and comparisons done in this case
22 and any reports prepared therefrom.
23 *MALDONADO, J. - LVMPD P#6920
24 MARSCHNER, JULIE - LVMPD P#8806 (or designee): Expert in the field of DNA
25 extractions, comparisons, analysis, and the identification of bodily fluids and is expected
26 MARTIN, TERRY - LVMPD P#5946 (or designee): CRIME SCENE ANALYST: Expert
27 in the identification, documentation, collection and preservation of evidence and is expected
28 to testify as an expert to the identification, documentation, collection and preservation of the

1 evidence in this case.
2 MAY, CRYSTAL – LVMPD P#9288 (or designee): Expert in the field of DNA extractions,
3 comparisons, analysis, and the identification of bodily fluids and is expected to testify
4 thereto.
5 MCCARTHY, JASON – LVMPD P#4715
6 *MCCLELLAND, A. - LVMPD P#8404
7 MCGHEE, EBONY – LVMPD P# 5158 (or designee): CRIME SCENE ANALYST: Expert
8 in the identification, documentation, collection and preservation of evidence and is expected
9 to testify as an expert to the identification, documentation, collection and preservation of the
10 evidence in this case.
11 MCGUIRE, J. - LVMPD P#14067
12 *MCINTYRE, M. - LVMPD P#13207
13 MCINTYRE, MORETTA – LVMPD P#13207 (or designee): CRIME SCENE ANALYST:
14 Expert in the identification, documentation, collection and preservation of evidence and is
15 expected to testify as an expert to the identification, documentation, collection and
16 preservation of the evidence in this case.
17 *MOORE, W. - LVMPD P#9003
18 *MORENO, IRENE - LVMPD P#2922
19 *MORRE, W. – LVMPD P#9003
20 MOSES, D. ANGEL – LVMPD P#8002 (or designee): FIREARMS/TOOLMARK
21 EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the
22 field of firearm and toolmark comparisons and is expected to testify thereto.
23 *MOSES, THERESA – 2645 SHERWOOD, LVN
24 MURGA, KIM – LVMPD P#10140 (or designee): Expert in the field of DNA extractions,
25 comparisons, analysis, and the identification of bodily fluids and is expected to testify
26 thereto.
27 *NAJARRO, BRENDON - LVMPD P#12616
28 NARVARRO, B. - LVMPD P#12616

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

5 *NOGLE, ERICA - LVMPD P#9624
6 *O'GRADY, A. - LVMPD P#14071
7 *OLSON, J. - NLVPD P#1811
8 OSTROVSKY, S. - LVMPD P#13902
9 *PAGE, K. - P#9159
10 *PARQUETTE, C. - LVMPD P#13937
11 *PATTON, J. - LVMPD P#8289
12 *PRICE, SHANE - LVMPD P#7207
13 *QUINN, P. - LVMPD P#4377
14 *RADER, REGGIE - LVMPD P#6099
15 RAETZ, DEAN - LVMPD P#4234
16 RETAMOZO, CAROL - LVMPD P#14280 (or designee): Expert in the field of DNA
17 extractions, comparisons, analysis, and the identification of bodily fluids and is expected to
18 testify thereto.

19 REVELS, JEROME - DISTRICT ATTORNEY INVESTIGATOR
20 *ROBINSON, TERRY - LVMPD P#7466
21 ROGERS, R. - LVMPD P#2858
22 SAHOTA, ERIC - LVMPD P#9932 (or designee): LATENT PRINT EXAMINER II -
23 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
24 case and any reports prepared therefrom.

25 *SCAVONE, R. - LVMPD P#9845
26 SCOTT, ASHLEY - 2645 SHERWOOD ST., #11, LVN 89109
27 SEAMAN-KELLY, JAN - LVMPD P#5666 (or designee): FIREARMS/TOOLMARK
28 EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the

1 field of firearm and toolmark comparisons and is expected to testify thereto.
2 SHELL, ELIZABETH - 1918 PINEDALE AVE., MEMPHIS, TN 38127
3 SIMS, DR. LARY - A medical doctor, employed by the Clark County Coroner's Office as
4 the Chief Medical Examiner/Forensic Pathologist. He is an expert in the area of forensic
5 pathology and will give scientific opinions related thereto. He is expected to testify
6 regarding the cause and manner of death of NATHAN RAWLS.
7 SMINK, JEFF - LVMPD P#6556 (or designee): CRIME SCENE ANALYST: Expert in the
8 identification, documentation, collection and preservation of evidence and is expected to
9 testify as an expert to the identification, documentation, collection and preservation of the
10 evidence in this case.
11 *SMITH, B. - LVMPD P#10059
12 *SOK, C. - LVMPD P#14069
13 SOKOLOWSKI, E. - LVMPD P#14190
14 *SOLANO, E. - LVMPD P#7588
15 *SOLDO, I. - LVMPD P#9153
16 *STEIBER, RAYMOND - LVMPD P#3542
17 *STOCKTON, D. - LVMPD P#9989
18 STONE, RANDALL - LVMPD P#2887 (or designee): FORENSIC LAB MANAGER with
19 the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and
20 toolmark comparisons and is expected to testify thereto.
21 TAYLOR, ERINMARIE - LVMPD P#9619 (or designee): CRIME SCENE ANALYST:
22 Expert in the identification, documentation, collection and preservation of evidence and is
23 expected to testify as an expert to the identification, documentation, collection and
24 preservation of the evidence in this case.
25 THOMAS, JENNIFER - LVMPD P#10074 (or designee): Expert in the field of DNA
26 extractions, comparisons, analysis, and the identification of bodily fluids and is expected to
27 testify thereto.
28 //

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

5 THOMAS, LAROY – 2655 SHERWOOD ST., #18, LVN 89109
6 to testify thereto.

7 *TORSIELLO, M. - LVMPD P#13149

8 *TRZPIS, STEPHEN - LVMPD P#8563

9 *TUCKER, KRISTEN - LVMPD P#14402

10 *TWOMEY, M. - LVMPD P#6501

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

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

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

19 *VORCE, RICHARD - LVMPD P#4055

20 WATTS, JOE – DISTRICT ATTORNEY INVESTIGATOR

21 WEBER, D. - LVMPD P#14457

22 *WELLS, D. - LVMPD P#1949

23 *WILLIAMS, WESTON - LVMPD P#9707

24 STEVEN B. WOLFSON
25 District Attorney
Nevada Bar #001565

26 BY /s//DANIELLE K. PIEPER

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

1
2 **CERTIFICATE OF ELECTRONIC FILING**

3 I hereby certify that service of State's Notice, was made this 24th day of January,
4 2014, by Electronic Filing to:

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

7 Shellie Warner
8 Secretary for the District Attorney's Office
9
10
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12
13
14
15
16
17
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21
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28

mmw/GANG

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: Brenda Vaandering

P# 13575

Date: 09-02-10

| CURRENT CLASSIFICATION | | | |
|-------------------------------|--------------------------------|---|---------------------------------|
| | <i>Classification</i> | <i>Minimum Qualifications</i> | |
| X | Crime Scene Analyst I | AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene | |
| X | Crime Scene Analyst II | 18 months - two (2) years continuous service with LVMPD as a Crime Scene Analyst I. | |
| | Senior Crime Scene Analyst | Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst. | |
| | Crime Scene Analyst Supervisor | Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field. | |
| FORMAL EDUCATION | | | |
| | <i>Institution</i> | <i>Major</i> | <i>Degree/Date</i> |
| | Western Oregon University | Forensic Chemistry | Bachelor's of Science / 06-2007 |
| | | | |
| | | | |
| | | | |
| TESTIMONY | | | |
| <i>Yes</i> | <i>No</i> | | |
| X | | Las Vegas Justice Court 09-15-2009 | |
| | | | |
| EMPLOYMENT HISTORY | | | |
| | <i>Employer</i> | <i>Title</i> | <i>Date</i> |
| | LVMPD | CSA I | 09-02-08 to 09-02-10 |
| | LVMPD | CSA II | 09-02-10 to Present |
| | | | |
| | | | |
| | | | |

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


CLERK OF THE COURT

Attorneys for Defendant
Matthew Washington

DISTRICT COURT
CLARK COUNTY

THE STATE OF NEVADA

Plaintiff

v.

MATTHEW WASHINGTON and

MARTELL MOTEN

Defendants.

) Case No. C-13-294695- 2

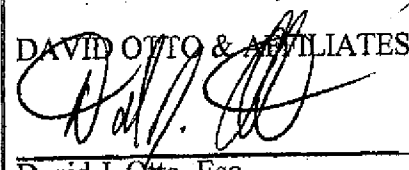
) Department No. XI

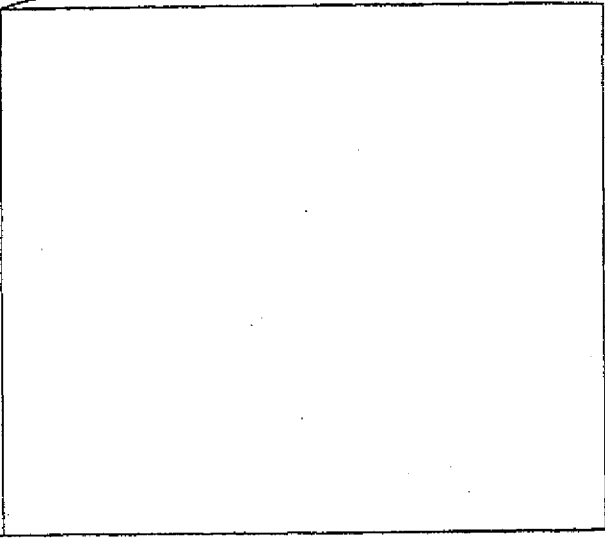
) **ORDER APPOINTING
INVESTIGATOR**

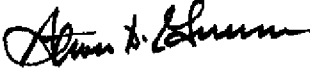
This COURT after hearing an Oral Motion for appointment of investigator made on January 22, 2014 by Matthew Washington's Defense Counsel, and finding that Defendant Matthew Washington is indigent, and pursuant to Widdis v. Second Judicial Dist. Court of State In and For County of Washoe, 968 P.2d 1165, 114 Nev. 1224 (Nev., 1998), the Court finding that an investigator should be appointed in this case It Is Hereby ORDERED:
Private Investigator James Conklin of ExFed Investigations is appointed to investigate this case on behalf of Matthew Washington and his Attorney. Such appointment shall be for no more than 50

1 hours of investigation into the facts and circumstances surrounding the above captioned case.
2 James Conklin's Business address is:
3 ExFed Investigations
4 2251 North Rampart Boulevard
5 Las Vegas, Nevada 89128

6 It is So ORDERED:  01/22/14
7 DISTRICT COURT JUDGE
8

9 Submitted by:
10 DATED this 22nd day of January 2014.
11 DAVID OTTO & ASSOCIATES, PC
12 
13 David J. Otto, Esq.
14 Nevada Bar #5449
15 2300 Sahara Ave, Suite 800
16 Las Vegas, Nevada 89102
17 davidottolaw@yahoo.com
18 Telephone: (702) 379-6540
19 Facsimile: (702) 629-7929
20
21 Counsel for Plaintiffs




CLERK OF THE COURT

1 **NOTC**

2 **STEVEN B. WOLFSON**
3 Clark County District Attorney
4 Nevada Bar #001565
5 **DANIELLE K. PIEPER**
6 Chief Deputy District Attorney
7 Nevada Bar #008610
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,

10 Plaintiff,

11 -vs-

12 MATTHEW WASHINGTON,
13 #2685499

Defendant.

CASE NO: C-13-294695-1

DEPT NO: XI

14 **THIRD SUPPLEMENTAL NOTICE OF WITNESSES**
15 **AND/OR EXPERT WITNESSES**
16 **[NRS 174.234]**

17 TO: MATTHEW WASHINGTON, Defendant; and

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

19 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the STATE OF
20 NEVADA intends to call the following witnesses in its case in chief:

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

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

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

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

28 ***Indicates an additional witness**

| | <u>NAME</u> | <u>ADDRESS</u> |
|----|--|--|
| 1 | ADAMS, TIFFANY - LVMPD P#10072 (or designee): | Expert in the field of DNA |
| 2 | | extractions, comparisons, analysis, and the identification of bodily fluids and is expected to |
| 3 | | testify thereto. |
| 4 | AOYAMA, KATHRYN - LVMPD P#8025 (or designee): | LATENT PRINT EXAMINER - |
| 5 | | Expert in the science and techniques of fingerprint comparison, and comparisons done in this |
| 6 | | case and any reports prepared therefrom. |
| 7 | ARCHER, ANTHONY - LVMPD P#6403 | |
| 8 | ARCINIEGA, D. - LVMPD P#14185 | |
| 9 | BAS, JENNIFER - LVMPD P#9944 (or designee): | Expert in the field of DNA extractions, |
| 10 | | comparisons, analysis, and the identification of bodily fluids and is expected to testify |
| 11 | | thereto. |
| 12 | BEAUDETTE, FRAN - LVMPD P#4361 (or designee): | Expert in the field of DNA |
| 13 | | extractions, comparisons, analysis, and the identification of bodily fluids and is expected to |
| 14 | | testify thereto. |
| 15 | BECHLER, MICHAEL - LVMPD P#4701 | |
| 16 | BECK, K. - LVMPD P#9629 | |
| 17 | BELL, L. - LVMPD P#13591 | |
| 18 | BELLO, GERARD - LVMPD P#6793 | |
| 19 | BENINCASA, FLOCERFIDA - LVMPD P#10170 (or designee): | Expert in the field of |
| 20 | | DNA extractions, comparisons, analysis, and the identification of bodily fluids and is |
| 21 | | expected to testify thereto. |
| 22 | BIDDLE, DAWN - 9540 AMBER VALLEY, LVN 89134 | |
| 23 | BLOUNT, DANIEL - LVMPD P#8287 | |
| 24 | BRANDON, J. - LMVPD 9631 | |
| 25 | BRISENDINE, D. - LVMPD P#14003 | |
| 26 | BUNTING, C. - LVMPD P#6484 | |
| 27 | BUTLER, WENDY - LVMPD P#8720 | |
| 28 | | |

1 CAMERON, CATHRYN – LVMPD P#9887 (or designee): LATENT PRINT EXAMINER I
2 - Expert in the science and techniques of fingerprint comparison, and comparisons done in
3 this case and any reports prepared therefrom.
4 CAMPBELL, T. – KOHL'S – 4250 BLUE DIAMOND, LVN
5 CAMPBELL, T. – LVMPD P#13402
6 CARTER, MARNIE – LVMPD P#8179 (or designee): LATENT PRINT EXAMINER II -
7 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
8 case and any reports prepared therefrom.
9 CHARLTON, N. - LVMPD P#13572
10 CLARKSON, CASEY - LVMPD P#9170
11 COOK, DARIN - LVMPD P#5730
12 COPLEY, B. - LVMPD P#14462
13 CROMWELL, MICHAEL – LVMPD P#13203 (or designee): CRIME SCENE ANALYST:
14 Expert in the identification, documentation, collection and preservation of evidence and is
15 expected to testify as an expert to the identification, documentation, collection and
16 preservation of the evidence in this case.
17 CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER
18 CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER INTEL
19 CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS
20 CUSTODIAN OF RECORDS – LVMPD RECORDS
21 CUSTODIAN OF RECORDS – NEVADA DEPT. OF MOTOR VEHICLES
22 *CUSTODIAN OF RECORDS – NEVADA DEPT. OF PAROLE & PROBATION
23 *CUSTODIAN OF RECORDS – NEVADA DEPT. OF PRISONS
24 *CUSTODIAN OF RECORDS - NLVPD
25 CUSTODIAN OF RECORDS – SHERWOOD PALMS, 2645 SHERWOOD, LVN
26 DARBOWSKI, J. - C/O CCDA, 200 LEWIS AVE., LVN 89101
27 DARR, A. - LVMPD P#5485
28 DESOTO, DARREN – 2635 SHERWOOD ST., #18, LVN 89109

1 DESOTO, LORRAINE - 2635 SHERWOOD ST., #18, LVN 89109

2 DOBLE, N. - LVMPD P#8298

3 DONOVAN, M. - LVMPD P#13241

4 DREDLA, M. - LVMPD P#8049

5 DUKE, JUSTIN - LVMPD P#13934

6 EDDINGTON, M. - LVMPD P#14206

7 EDWARDS, T. - LVMPD P#9035

8 FELLIG, D. - NLVPD P#2194

9 FERGUSON, P. - LVMPD P#7469

10 FIGUORA, J. - C/O SUNRISE HOSPITAL

11 FINK, JAMES - LVMPD P#4780

12 FORNI, GARRETT - LVMPD P#14080

13 FRAZIER, A. - LVMPD P#9152

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

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

20 GILLIS, M. - LVMPD P#6432

21 GOLLMER, J. - LVMPD P#13429

22 GOMEZ, JUAN - 3400 CABANA DRIVE, # 1050, LVN 89122

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

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12 HARRIS, N. - NLVPD P#1962
13 HEITZENRATER, J. - NLVPD P#2029
14 HEMPHILL, JOSEPH - LVMPD P#9061
15 HILL, MARQUE - 2655 SHERWOOD ST., #18, LVN 89109
16 HODSON, B. - LVMPD P#9034
17 HOGAN, A. - LVMPD P#8279
18 HOLSTEIN, D. - LVMPD P#3861
19 HONAKER, JAMIE - DISTRICT ATTORNEY INVESTIGATOR
20 HUFF, C. - LVMPD P#8888
21 HUTCHASON, S. - LVMPD P#7088
22 IZZO, SHAWN - LVMPD P#9319
23 JACKSON, ALVIN - ADDRESS UNKNOWN
24 JACKSON, QUAMAE - 4800 E. TROPICANA, APT. 1021, LVN 89121
25 JAHN, PETER - LVMPD P#7461
26 JOHNSON, DAVID - LVMPD P#9933 (or designee): LATENT PRINT EXAMINER II -
27 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
28 case and any reports prepared therefrom.

1 JONES, LESLIE – ADDRESS UNKNOWN
2 JONES, N. - LVMPD P#9043
3 KELVINGTON, A. - LVMPD P#8878
4 KING, CRAIG – LVMPD P#9971 (or designee): Expert in the field of DNA extractions,
5 comparisons, analysis, and the identification of bodily fluids and is expected to testify
6 thereto.
7 KRYLO, JAMES – LVMPD P#5945 (or designee): FIREARMS/TOOLMARK
8 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
9 field of firearm and toolmark comparisons and is expected to testify thereto.
10 LAMOTHE, JOSHUA - LVMPD P#9364
11 LEBLANC, B. – LVMPD P#7316
12 LESTER, ANYA “SANKO” – LVMPD P#13771 (or designee): FIREARMS/TOOLMARK
13 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
14 field of firearm and toolmark comparisons and is expected to testify thereto.
15 LIVELY, JAMES - C/O CCDA, 200 LEWIS AVE., LVN 89101
16 LOPEZ-MATOS, YAON – 6500 VEGAS DR., LVN 89108
17 LYNCH, M. - LVMPD P#8284
18 LYNCH, SHANDRA – LVMPD P#13206 (or designee): CRIME SCENE ANALYST II:
19 Expert in the identification, documentation, collection and preservation of evidence and is
20 expected to testify as an expert to the identification, documentation, collection and
21 preservation of the evidence in this case.
22 MACEO, ALICE – LVMPD P#7828 (or designee): LATENT PRINT EXAMINER - Expert
23 in the science and techniques of fingerprint comparison, and comparisons done in this case
24 and any reports prepared therefrom.
25 MALDONADO, J. - LVMPD P#6920
26 MARSCHNER, JULIE – LVMPD P#8806 (or designee): Expert in the field of DNA
27 extractions, comparisons, analysis, and the identification of bodily fluids and is expected to
28 testify thereto.

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

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

8 MCCARTHY, JASON – LVMPD P#4715

9 MCCLELLAND, A. - LVMPD P#8404

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

14 MCGUIRE, J. - LVMPD P#14067

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

19 MOORE, W. - LVMPD P#9003

20 MORENO, IRENE - LVMPD P#2922

21 MORRE, W. – LVMPD P#9003

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

25 MOSES, THERESA – 2645 SHERWOOD, LVN

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

1 NAJARRO, BRENDON - LVMPD P#12616
2 NARVARRO, B. - LVMPD P#12616
3 NEMICK, AMY - LVMPD P#8504 (or designee): CRIME SCENE ANALYST: Expert in
4 the identification, documentation, collection and preservation of evidence and is expected to
5 testify as an expert to the identification, documentation, collection and preservation of the
6 evidence in this case.
7 NOGLE, ERICA - LVMPD P#9624
8 O'GRADY, A. - LVMPD P#14071
9 OLSON, J. - NLVPD P#1811
10 OSTROVSKY, S. - LVMPD P#13902
11 PAGE, K. - P#9159
12 PARQUETTE, C. - LVMPD P#13937
13 PATTON, J. - LVMPD P#8289
14 PRICE, SHANE - LVMPD P#7207
15 QUINN, P. - LVMPD P#4377
16 RADER, REGGIE - LVMPD P#6099
17 RAETZ, DEAN - LVMPD P#4234
18 RETAMOZO, CAROL - LVMPD P#14280 (or designee): Expert in the field of DNA
19 extractions, comparisons, analysis, and the identification of bodily fluids and is expected to
20 testify thereto.
21 REVELS, JEROME - DISTRICT ATTORNEY INVESTIGATOR
22 ROBINSON, TERRY - LVMPD P#7466
23 ROGERS, R. - LVMPD P#2858
24 SAHOTA, ERIC - LVMPD P#9932 (or designee): LATENT PRINT EXAMINER II -
25 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
26 case and any reports prepared therefrom.
27 SCAVONE, R. - LVMPD P#9845
28 SCOTT, ASHLEY - 2645 SHERWOOD ST., #11, LVN 89109

1 SEAMAN-KELLY, JAN - LVMPD P#5666 (or designee): FIREARMS/TOOLMARK
2 EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the
3 field of firearm and toolmark comparisons and is expected to testify thereto.
4 SHELL, ELIZABETH - 1918 PINEDALE AVE., MEMPHIS, TN 38127
5 SIMS, DR. LARY - A medical doctor, employed by the Clark County Coroner's Office as
6 the Chief Medical Examiner/Forensic Pathologist. He is an expert in the area of forensic
7 pathology and will give scientific opinions related thereto. He is expected to testify
8 regarding the cause and manner of death of NATHAN RAWLS.
9 SMINK, JEFF - LVMPD P#6556 (or designee): CRIME SCENE ANALYST: Expert in the
10 identification, documentation, collection and preservation of evidence and is expected to
11 testify as an expert to the identification, documentation, collection and preservation of the
12 evidence in this case.
13 SMITH, B. - LVMPD P#10059
14 SOK, C. - LVMPD P#14069
15 SOKOLOWSKI, E. - LVMPD P#14190
16 SOLANO, E. - LVMPD P#7588
17 SOLDI, I. - LVMPD P#9153
18 STEIBER, RAYMOND - LVMPD P#3542
19 STOCKTON, D. - LVMPD P#9989
20 STONE, RANDALL - LVMPD P#2887 (or designee): FORENSIC LAB MANAGER with
21 the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and
22 toolmark comparisons and is expected to testify thereto.
23 TAYLOR, ERINMARIE - LVMPD P#9619 (or designee): CRIME SCENE ANALYST:
24 Expert in the identification, documentation, collection and preservation of evidence and is
25 expected to testify as an expert to the identification, documentation, collection and
26 preservation of the evidence in this case.
27 //
28 //

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

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

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

9 TORSIELLO, M. - LVMPD P#13149

10 TRZPIS, STEPHEN - LVMPD P#8563

11 TUCKER, KRISTEN - LVMPD P#14402

12 TWOMEY, M. - LVMPD P#6501

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

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

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

21 VORCE, RICHARD - LVMPD P#4055

22 WATTS, JOE – DISTRICT ATTORNEY INVESTIGATOR

23 WEBER, D. - LVMPD P#14457

24 //

25 //

26 //

27 //

28 //

1 WELLS, D. - LVMPD P#1949
2 WILLIAMS, WESTON - LVMPD P#9707

3 STEVEN B. WOLFSON
4 District Attorney
Nevada Bar #001565

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

8
9 **CERTIFICATE OF ELECTRONIC FILING**

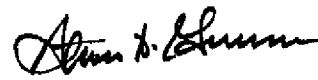
10 I hereby certify that service of State's Notice, was made this 30th day of January,
11 2014, by Electronic Filing to:

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

14 Shellie Warner
15 Secretary for the District Attorney's Office

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28 mmw/GANG

1 NOAC
2 **WARM SPRINGS LAW GROUP**
3 ROBERTA OHLINGER-JOHNSON, ESQ.
4 Nevada Bar #10946
5 1489 W. Warm Springs Rd. Ste. 110
6 Henderson NV 89014
7 702.966.8270 Telephone
8 866.592.8806 Facsimile
9 info@WarmSpringsLaw.com
10 Attorney for Defendant


CLERK OF THE COURT

7 DISTRICT COURT
8 CLARK COUNTY, NEVADA

9 STATE OF NEVADA,

10 vs.

11 MATTHEW WASHINGTON.

) Case No.: C-13-294695-1


) Dept. No.: 11

12 **NOTICE OF ASSOCIATION**
13

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

18 Roberta Ohlinger-Johnson, Esq.
19 WARM SPRINGS LAW GROUP
20 1489 W. Warm Springs Road,
21 Suite #110
22 Henderson, NV 89014

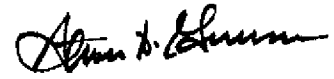
23 Respectfully submitted this 5th day of March, 2014.

24 
25 ROBERTA OHLINGER-JOHNSON, ESQ.
26 Nevada Bar #10946
27 ELLIOTT D. YUG, ESQ.
28 Nevada Bar #5172
Attorney for Defendant Matthew Washington

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Dated this 5th day of March, 2014.

Roberta Ohlinger Johnson, Esq.
WARM SPRINGS LAW GROUP


CLERK OF THE COURT

NOTM

DAVID OTTO & AFFILIATES, PC

David J. Otto, Esq.

Nevada State Bar No. 5449

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efile@WarmSpringsLaw.com

Attorneys for Defendant

Attorneys for Defendant

Matthew Washington

DISTRICT COURT
CLARK COUNTY

THE STATE OF NEVADA

Plaintiff

v.

MATTHEW WASHINGTON

Defendant.

) Case No. C-13-294695- 1

) Department No. XI

**NOTICE OF MOTION and
MOTION IN LIMINE**

NOTICE OF MOTION

TO: STATE OF NEVADA, Plaintiff

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

1 Limit or exclude evidence as shown in the following motion.

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

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

15 Submitted by:

16 DATED this 6th day of March 2014.

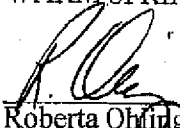
17 DAVID OTTO & AFFILIATES, PC

18 /s/ David J. Otto

19 David J. Otto, Esq.
20 Nevada Bar #5449
21 2300 Sahara Ave, Suite 800
22 Las Vegas, Nevada 89102
23 davidottolaw@yahoo.com
24 Telephone: (702) 379-6540
25 Facsimile: (702) 629-7929

26 Counsel for Plaintiffs

WARM SPRINGS LAW GROUP

27  3-10-14
28 Roberta Ohlinger-Johnson, Esq.
Nevada Bar #10946
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Henderson, NV 89014
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866.592.8806 Facsimile

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MEMORANDUM IN SUPPORT OF MOTION IN LIMINE

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

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

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

1 use of uncharged bad act evidence to convict a defendant is heavily disfavored in our criminal
2 justice system because bad acts are often irrelevant and prejudicial and force the accused to defend
3 against vague and unsubstantiated charges.” Tavares v. State, 117 Nev. 725, 730, 30 P.3d 1128,
4 1131 (2001). To ensure that this type of evidence is not misused, we have held that it is admissible
5 only when the trial court determines that (1) the evidence is relevant to the crime charged, (2) the
6 act is proven by clear and convincing evidence, and (3) the probative value of the evidence is not
7 substantially outweighed by the danger of unfair prejudice. Tinch v. State, 113 Nev. 1170, 1176,
8 946 P.2d 1061, 1064–65 (1997). However, we failed to explain what purposes the evidence must
9 be relevant for. To avoid further confusion, we modify the first factor in Tinch to reflect the narrow
10 limits of the general rule of exclusion. In order to overcome the presumption of inadmissibility, the
11 prosecutor must request a hearing and establish that: (1) the prior bad act is relevant to the crime
12 charged and for a purpose other than proving the defendant's propensity, (2) the act is proven by
13 clear and convincing evidence, and (3) the probative value of the evidence is not substantially
14 outweighed by the danger of unfair prejudice.”

Bigpond v. State, 270 P.3d 1244, 128 Nev. Adv. Op. 10 (Nev., 2012)

15 The relevant language of Federal Rule of Evidence 404 which is substantially similar to NRS
16 48.045 (2) provides that similar acts evidence is potentially admissible “upon request by the
17 accused, the prosecution in a criminal case shall provide reasonable notice in advance of trial, or
18 during trial if the court excuses pretrial notice on good cause shown, of the general nature of any
19 such evidence it intends to introduce at trial.

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

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

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

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

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

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

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

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

23 ///

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CONCLUSION

For the foregoing reasons the above motion should be granted.

Submitted by:

DATED this 6th day of March 2014.

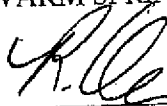
DAVID OTTO & AFFILIATES, PC

/s/ David J. Otto

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davidottolaw@yahoo.com
Telephone: (702) 379-6540
Facsimile: (702) 629-7929

Counsel for Plaintiffs

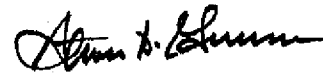
WARM SPRINGS LAW GROUP

 3-10-14
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CLERK OF THE COURT

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Attorneys for Defendant
Matthew Washington

DISTRICT COURT
CLARK COUNTY, NEVADA

STATE OF NEVADA,

vs.

MATTHEW WASHINGTON.

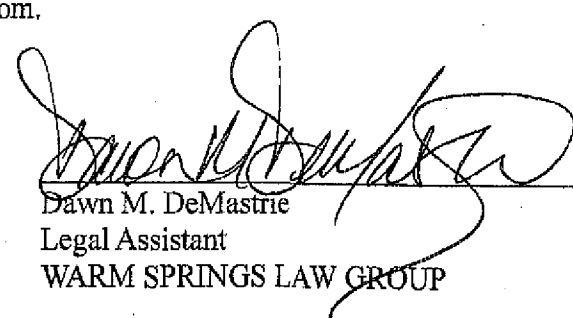
Case No.: C-13-294695-1

Dept. No.: 11

CERTIFICATE OF SERVICE

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

Dated this 11th day of March, 2014.



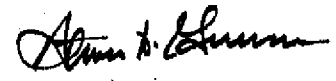
Dawn M. DeMastrie

Legal Assistant

WARM SPRINGS LAW GROUP

Page - 1

Washington - Case No.: C-13-+294695-1
CSERV Notice & Motion in Limine


CLERK OF THE COURT

1 **OPPS**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 DANIELLE K. PIEPER
6 Chief Deputy District Attorney
7 Nevada Bar #008610
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,

10 Plaintiff,

11 -vs-

12 MATTHEW WASHINGTON,
13 #2685499

14 Defendant.

CASE NO: C-13-294695-1

DEPT NO: XI

15 **STATE'S OPPOSITION TO DEFENDANT'S MOTION IN LIMINE**

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

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

22 This Opposition is made and based upon all the papers and pleadings on file herein, the
23 attached points and authorities in support hereof, and oral argument at the time of hearing, if
24 deemed necessary by this Honorable Court.

25 //

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1
2
3 **POINTS AND AUTHORITIES**

4 **STATEMENT OF THE CASE**

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

13 Additionally, the State of Nevada filed an Amended Criminal Complaint in open court
14 charging Defendants with one (1) count of Conspiracy to Commit Murder with the Intent to
15 Promote, Further or Assist a Criminal Gang, one (1) count of Murder with use of a Deadly
16 Weapon, with the Intent to Promote, Further or Assist a Criminal Gang, three (3) counts of
17 Attempt Murder with use of a Deadly Weapon, with the Intent to Promote, Further or Assist a
18 Criminal Gang, two (2) counts of Battery with Use of a Deadly Weapon Resulting in
19 Substantial Bodily Harm with the Intent to Promote, Further or Assist a Criminal Gang, and
20 ten (10) counts of Discharging a Firearm at or Into a Structure with the Intent to Promote,
21 Further or Assist a Criminal Gang and one (1) count of Possession of Firearm by Ex Felon. A
22 preliminary hearing was set for December 5, 2013. On December 5, 2013, the State started
23 its presentation of evidence. The Court continued the preliminary hearing until December 9,
24 2013. On December 9, 2013, the State finished its presentation of probable cause. Defendants
25 were bound over to District Court on all charges without the gang enhancement and without
26 substantial bodily injury to one of the counts.

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

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

7 **THE STATEMENT OF THE FACTS**

8 On November 5, 2013, just after 4:30 AM, approximately ten (10) shots were fired into
9 the residence of 2655 Sherwood Street, Apt #18. The multiple shots left three (3) victims still
10 breathing – Laroy Thomas, Marque Hill and Ashley Scott. Of the three (3), two (2) Laroy
11 Thomas and Ashley Scott sustained gunshot wounds to their ankle areas. The fourth victim,
12 Nathan Rawls, was killed by the gunshot wound that hit his chest. Rawls was found dead by
13 the couch in the living room area. The apartment was riddled with bullet holes. On November
14 5, 2013, at approximately 4:30AM, Lorraine Desoto, was in the area of 2655 Sherwood Street
15 and was awoken by gunfire. Desoto got up, got dressed, looked out the window and saw a
16 vehicle. The vehicle was in an alley. The vehicle was a silver Dodge Magnum. The silver
17 Dodge Magnum was driving west toward Van Patten. Desoto then called 911. Later that day
18 police took Desoto to a location where she identified the silver Dodge Magnum as the vehicle
19 she saw leave the alley.

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

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

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

11 On November 5, 2013, Detective Raetz went to the crime scene and observed bullet
12 holes in apartment #18 of 2655 Sherwood Street. There were 13 separate cartridge cases - 9
13 located out in the courtyard itself. Six (6) were 9 millimeter cartridge casings and seven (7)
14 40 caliber cartridge casings.

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

20 **STATE UNDERSTANDS ITS OBLIATIONS UNDER BRUTON vs. UNITED**
21 **STATES**

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

1 (1997) (overruled on other grounds); Stevens v. State, 97 Nev. 443 (1981); see also Richardson
2 v. Marsh, 481 U.S. 200, 107 S.Ct. 1702 (1987).

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

5 We hold, therefore, that editing a non-testifying codefendant's
6 extrajudicial statement to substitute pronouns or similar neutral
7 terms for the defendant's name will not invariably be sufficient to
8 avoid violation of the defendant's Sixth Amendment confrontation
9 rights. Rather, the sufficiency of this form of editing must be
10 determined on a case-by-case basis in light of the statement as a
11 whole and the other evidence presented at the trial. Fletcher, at
12 582, 197.

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

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

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

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

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

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

19 THE STATE UNDERSTANDS IS OBLIGATION UNDER NRS 48.045 (2)

20 AND PETROCELLI

21 Pursuant to NRS 48.045(2), "evidence of other crimes, wrongs or acts is not admissible
22 to prove the character of a person in order to show that he acted in conformity
23 therewith." However, such evidence may "be admissible for other purposes, such as proof of
24 motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or
25 accident." See also Canada v. State, 104 Nev. 288, 291-293, 756 P.2d 552, 554-555
26 (1988)(Evidence of other robbery was admissible for purpose of proving identity given the
27 difficulty of identifying the suspects and the high degree of similarities between the crimes). In
28 order to admit such evidence, the State must establish that (1) the prior act is relevant to the
crime charged; (2) the act is proven by clear and convincing evidence; and (3) the evidence is
more probative than prejudicial. Cipriano v. State, 111 Nev. 534, 541, 894 P.2d 347, 352
(1995), *overruled on other grounds by* State v. Sixth Judicial District Court, 114 Nev. 739,
964 P.2d 48 (1998). The admissibility of prior bad acts is within the sound discretion of the
trial court and will not be overturned on appeal unless found to be manifestly wrong. Canada,

1 104 Nev. at 292, 756 P.2d at 554.

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

12 In United States v. Haxelett, 32 F.3d 1313 (8th Cir. 1994), evidence of previous arrest
13 for possession of crack cocaine was admissible to show knowledge and intent to distribute. In
14 fact, despite the fact that the conviction was reversed in Haxelett, evidence of the arrest was
15 deemed admissible in a subsequent trial. Similarly, in United States v. Ramirez-Calderone,
16 810 F.Supp. 136 (MD Pa. 1992), the court held that evidence of a defendant's prior drug
17 dealings was admissible under Rule 404(b) for purpose of showing previous relationship with
18 a co-conspirator, background, familiarity with drug transactions, scheme, knowledge and
19 intent. The court in Ramirez-Calderone further held that "admissibility for additional purposes
20 including essential background information . . . has been recognized and approved by our
21 Court of Appeals." Id. at 138 (citing U.S. v. Scarfo, 850 F.2d 1015, 1019 (3rd
22 Cir.1988)). Moreover, in Ford v. State, 122 Nev. 796, --, 138 P.3d 500, 507 (2005), the
23 Supreme Court upheld the admission of evidence of other burglaries to prove the Defendant's
24 intent and/or absence of mistake when he broke into the victim's home.

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

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

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

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

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

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

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

1 Nevada Revised Statute 48.045(2) also allows the use of other uncharged misconduct
2 to show intent, plan, knowledge, identity or absence of mistake or accident. There is no
3 requirement that the proposed evidence be of a conviction. *See for example Darnell v. State*,
4 92 Nev. 680, 558 P.2d 642 (1976), where evidence that the defendant had previously
5 purchased stolen property was properly admitted to prove he intended to possess stolen
6 property in an attempt prosecution. Also, in *Reed v. State*, 95 Nev. 190, 591 P.2d (1979), the
7 State was permitted to admit evidence of two (2) other motel burglaries where the defendant's
8 fingerprints were recovered, to show identity. And in *Petrocelli v. State*, 101 Nev. 46, 692
9 P.2d 503, and *Thompson v. State*, 102 Nev. 348, 721 P.2d 1290 (1986), the court permitted
10 evidence of other uncharged misconduct in order to show plan. (*Petrocelli v. State*, 101 Nev.
11 46, *modified on other grounds by Sonner v. State*, 112 Nev. 1328, 1333-34, (1996) and
12 *superseded in part by statute as stated in Thomas v. State*, 120 Nev. 37, 45, (2004)).

13 Furthermore, "clear and convincing proof of collateral acts can be established by an
14 offer of proof outside the presence of the jury combined with the quality of the evidence
15 actually presented to the jury." *Salgado v. State*, 114 Nev. 1039, 1043, 968 P.2d 324
16 (1998). Since the defendant has never been adjudicated guilty in the arrest, the State must
17 show by clear and convincing evidence that the defendant committed the other
18 crimes. *Petrocelli v. State*, 101 Nev. 46. The State intends to do so in an evidentiary hearing
19 prior to trial.

20 Finally, to ensure such evidence is considered by the jury only for the proper purposes
21 in which it would be admitted a limiting instruction to the jury should be given both at the
22 time the evidence is presented and in the closing instructions. *Tavares v. State*, 117 Nev. 725,
23 (2001)(*holding modified by Mclellan v. State*, 182 P.3d 106, 110 (Nev. 2008)(clarifying that
24 the defendant may waive the giving of a limiting instruction when the bad act evidence is
25 admitted at trial). The State requests such an instruction be given if evidence of uncharged
26 misconduct is sought to be admitted.

27 //

28 //

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

5 **CONCLUSION**

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

8 DATED this 21st day of March, 2014.

9 Respectfully submitted,

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

13 BY /s//DANIELLE K. PIEPER
14 DANIELLE K. PIEPER
15 Chief Deputy District Attorney
16 Nevada Bar #008610

17 **CERTIFICATE OF ELECTRONIC FILING**

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

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

22 Shellie Warner
23 Secretary for the District Attorney's Office

24
25
26
27
28 DKP/mmw/GANG

ORIGINAL

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FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

APR 07 2014

BY Michele Tucker
MICHELE TUCKER, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

C-13-294695-1
AINF
Amended Information
3682299



10 THE STATE OF NEVADA,
11 Plaintiff,

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

12 -vs-

13 MATTHEW WASHINGTON,
14 #2685499
15 Defendant.

AMENDED
INFORMATION

16 STATE OF NEVADA }
17 COUNTY OF CLARK } ss.

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

20 That MATTHEW WASHINGTON, the Defendant above named, having committed
21 the crimes of CONSPIRACY TO COMMIT MURDER (Category B Felony NRS -
22 199.480, 200.010, 200.030); MURDER WITH USE OF A DEADLY WEAPON
23 (Category A Felony NRS - 200.010, 200.030); ATTEMPT MURDER WITH USE OF A
24 DEADLY WEAPON (Category B Felony NRS - 193.330, 200.010, 200.030); BATTERY
25 WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY
26 HARM (Category B Felony NRS - 200.481.2e); BATTERY WITH USE OF A
27 DEADLY WEAPON (Category B Felony NRS - 200.481); DISCHARGING FIREARM
28 AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT (Category

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

4 COUNT 1 - CONSPIRACY TO COMMIT MURDER

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

12 COUNT 2 - MURDER WITH USE OF A DEADLY WEAPON

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

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

9 COUNT 3 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

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

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

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

5 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
6 unnamed coconspirator 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, by shooting at and into the body of the said ASHLEY SCOTT,
9 resulting in substantial bodily harm to the said ASHLEY SCOTT, Defendant MATTHEW
10 WASHINGTON and MARTELL MOTEN, being responsible under one or more of the
11 following principles of criminal liability, to-wit: (1) by directly committing said act, and/or
12 (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed
13 coconspirator, aiding or abetting each other, by providing counsel and encouragement and by
14 assisting each other in this crime by accompanying each other to the crime scene where one
15 of more of their member acted as lookouts, as one or more of their member discharged one
16 or more firearms multiple times striking at and into the body of ASHLEY SCOTT,
17 Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed
18 coconspirator left the crime together immediately after the shooting, Defendant MATTHEW
19 WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert
20 throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the
21 unnamed coconspirator counseling and encouraging each other throughout by words or
22 deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an
23 unnamed coconspirator, conspiring with each other to commit this crime whereby each is
24 vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

25 COUNT 5 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

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

1 by shooting at and into the body of the said LAROY THOMAS, with a deadly weapon, to-
2 wit: a firearm, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being
3 responsible under one or more of the following principles of criminal liability, to-wit: (1) by
4 directly committing said act, and/or (2) by Defendant 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 LAROY THOMAS, Defendant
10 MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator
11 left the crime together immediately after the shooting, Defendant MATTHEW
12 WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert
13 throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the
14 unnamed coconspirator counseling and encouraging each other throughout by words or
15 deeds, and/or (3) Defendant 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 COUNT 6 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

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

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

13 COUNT 7 - BATTERY WITH USE OF A DEADLY WEAPON

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

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

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

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

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

25 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
26 unnamed coconspirator 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 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant

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

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

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

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

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

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

20 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
21 unnamed coconspirator 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, Defendant
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 Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or
27 unnamed coconspirator, aiding or abetting each other in the commission of this crime with
28 the intent to commit this crime by accompanying each other to the crime scene where one of

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

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

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

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

26 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
27 unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously
28 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, Defendant
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 Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or
5 unnamed coconspirator, aiding or abetting each other in the commission of this crime with
6 the intent to commit this crime by accompanying each other to the crime scene where one of
7 more of their member acted as lookouts, as one or more of their member discharged one or
8 more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON
9 and MARTELL MOTEN and/or an unnamed coconspirator left the crime together
10 immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL
11 MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to
12 a conspiracy to commit this crime.

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

15 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
16 unnamed coconspirator 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, Defendant
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 Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or
22 unnamed coconspirator, aiding or abetting each other in the commission of this crime with
23 the intent to commit this crime by accompanying each other to the crime scene where one of
24 more of their member acted as lookouts, as one or more of their member discharged one or
25 more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON
26 and MARTELL MOTEN and/or an unnamed coconspirator left the crime together
27 immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL
28

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

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

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

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

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

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

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

12 BY

13 DANIELLE K. PIEPER
14 Chief Deputy District Attorney
15 Nevada Bar #008610
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1 Names of witnesses known to the District Attorney's Office at the time of filing this
2 Information are as follows:

| 3 | <u>NAME</u> | <u>ADDRESS</u> |
|----|--|----------------|
| 4 | CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER | |
| 5 | CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS | |
| 6 | CUSTODIAN OF RECORDS – LVMPD RECORDS | |
| 7 | DESOTO, DARRIN – 2635 SHERWOOD ST., #18, LVN 89109 | |
| 8 | DESOTO, DARRIN – 2635 SHERWOOD ST., #18, LVN 89109 | |
| 9 | FINK, JAMES – LVMPD P#4780 | |
| 10 | HILL, MARQUE – 2655 SHERWOOD ST., #18, LVN 89109 | |
| 11 | HONAKER, JAMIE – DISTRICT ATTORNEY INVESTIGATOR | |
| 12 | MCCARTHY, JASON – LVMPD P#4715 | |
| 13 | PAIQUETTE, C. – LVMPD P#13937 | |
| 14 | RAETZ, DEAN – LVMPD P#4234 | |
| 15 | REVELS, JEROME – DISTRICT ATTORNEY INVESTIGATOR | |
| 16 | ROGERS, R. – LVMPD P#2858 | |
| 17 | SCOTT, ASHLEY – 2645 SHERWOOD ST., #11, LVN 89109 | |
| 18 | SHELL, ELIZABETH – 1918 PINEDALE AVE., MEMPHIS, TN 38127 | |
| 19 | SIMMS, DR. LARY – CLARK COUNTY CORONER'S OFFICE | |
| 20 | THOMAS, LAROY – 2655 SHERWOOD ST., #18, LVN 89109 | |
| 21 | WATTS, JOE – DISTRICT ATTORNEY INVESTIGATOR | |

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

ORIGINAL

AINF
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
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200 Lewis Avenue
Las Vegas, Nevada 89155-2212
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Attorney for Plaintiff

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

APR 11 2014

BY *Michele Tucker*
MICHELE TUCKER, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

C-13-294695-1
AMEN
Amended
3681631



THE STATE OF NEVADA,

Plaintiff,

Case No: C-13-294695-1

Dept No: I

-vs-

MATTHEW WASHINGTON,
#2685499

Defendant.

SECOND AMENDED
INFORMATION

STATE OF NEVADA }
COUNTY OF CLARK } ss.

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

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

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

3 COUNT 1 - CONSPIRACY TO COMMIT MURDER

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

11 COUNT 2 - MURDER WITH USE OF A DEADLY WEAPON

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

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

8 COUNT 3 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

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

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

3 COUNT 4 - BATTERY WITH USE OF A DEADLY WEAPON

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

24 COUNT 5 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

25 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
26 unnamed coconspirator, did then and there, without authority of law, and malice aforethought,
27 willfully and feloniously attempt to kill LAROY THOMAS, a human being, by shooting at
28

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

18 COUNT 6 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

19 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
20 unnamed coconspirator, did then and there, without authority of law, and malice aforethought,
21 willfully and feloniously attempt to kill MARQUE HILL, a human being, by shooting at the
22 body of the said MARQUE HILL, with a deadly weapon, to-wit: a firearm, Defendant
23 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more
24 of the following principles of criminal liability, to-wit: (1) by directly committing said act,
25 and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or
26 unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing
27 occur, by providing counsel and encouragement and by assisting each other in this crime by
28

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

12 COUNT 7 - BATTERY WITH USE OF A DEADLY WEAPON

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

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

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

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

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

25 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
26 unnamed coconspirator 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

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

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

15 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
16 unnamed coconspirator 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, Defendant
19 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more
20 of the following principles of criminal liability, to-wit: (1) by directly committing said act,
21 and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or
22 unnamed coconspirator, aiding or abetting each other in the commission of this crime with the
23 intent to commit this crime by accompanying each other to the crime scene where one or more
24 of their member acted as lookouts, as one or more of their member discharged one or more
25 firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and
26 MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately
27 after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the
28

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

3
4 COUNT 11 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE,
5 AIRCRAFT, OR WATERCRAFT

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

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

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

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

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

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

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

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

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

18 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
19 unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously
20 discharge a firearm at or into a structure, said structure, not having been abandoned, located
21 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant
22 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more
23 of the following principles of criminal liability, to-wit: (1) by directly committing said act,
24 and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or
25 unnamed coconspirator, aiding or abetting each other in the commission of this crime with the
26 intent to commit this crime by accompanying each other to the crime scene where one or more
27 of their member acted as lookouts, as one or more of their member discharged one or more
28

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

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

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

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

25 Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an
26 unnamed coconspirator did then and there willfully, unlawfully, maliciously, and feloniously
27 discharge a firearm at or into a structure, said structure, not having been abandoned, located
28

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

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

15
16 BY

17 DANIELLE K. PIEPER
18 Chief Deputy District Attorney
19 Nevada Bar #008610
20
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24
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26 DA#13F18022A/B/mmw/GANG
27 LVMPD EV#1311050479
28 (TK5)

APR 15 2014

DISTRICT COURT
CLARK COUNTY, NEVADA

BY 
MICHELE TUCKER, DEPUTY

THE STATE OF NEVADA

Plaintiff(s),

CASE NO. C294695-1

-vs-

DEPT. NO. I

MATTHEW WASHINGTON

Defendant(s).

PROPOSED JURY INSTRUCTIONS NOT USED AT TRIAL

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

DATED: This 15th day of April, 2014.

Steven D. Grierson, Clerk of the Court

By: 

Michele L. Tucker, Deputy Clerk

1 INST

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4
5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7 THE STATE OF NEVADA,)

8 Plaintiff,)

9 -vs-)

10 MATTHEW WASHINGTON,)

11 Defendant.)
12

CASE NO: C-13-294695-1

DEPT NO: I

13
14 In addition to the instructions proposed by the State in this Case – Defendant Matthew
15 Washington proposes the following instructions also be given to the Jury.
16

17 DEFENSE PROPOSED INSTRUCTIONS TO THE JURY
18

19 INSTRUCTION NO. _____
20

21 Motive is not an element of the crime charged and need not be shown. However, you may
22 consider motive or lack of motive as a circumstance in this case. Presence of motive may
23 tend to establish guilt. Absence of motive may be sufficient to leave you with a reasonable
24 doubt as to the guilt of the defendant. You will therefore give its presence or absence, as the
25 case may be, the weight to which you find it to be entitled.
26

27 People v. Estep (96) 42 CA4th 733 [49 CR2d 859] held that the
28

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

6
7 People v. Frye (98) 18 C4th 894, 958 [77 CR2d 25] held that in
8 light of other instructions given in that case, and the prosecutor's
9 argument, use of the term innocence in CJ 2.51 regarding motive
10 did not shift the burden of proof to the defendant to prove his
11 innocence.

12
13
14 INSTRUCTION NO. _____

15
16 Battery with a Deadly Weapon is a lesser included offense of Attempted Murder. The Court
17 instructs the jury that you may find the defendant guilty of this lesser included offense of
18 Battery with a Deadly Weapon if you do not find the defendant guilty of Attempted Murder.
19 The Court instructs the jury that you may find the defendant guilty of this lesser included
20 offense of Battery with a Deadly Weapon if you do not find the defendant guilty of
21 Attempted Murder with a deadly weapon.

22
23 Walker v. State, 110 Nev. 571, 876 P.2d 646 (Nev., 1994)

24
25
26 Submitted by David J. Otto, on behalf of Defendant Matthew Washington April 15, 2014.
27
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No. 65998

vi.

Respondent.

9

12 | Attorney for Appellant

Counsel for Respondent

16

17

21

22

Employee, Clark County Public Defender's Office

Employee, Clark County Public Defender's Office

28

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2
3 MATTHEW WASHINGTON,

No. 65998

4 Appellant,

5 v.

6 THE STATE OF NEVADA,

7 Respondent.

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

8
9 **APPELLANT'S APPENDIX VOLUME III PAGES 445-687**

10 PHILIP J. KOHN
11 Clark County Public Defender
12 309 South Third Street
13 Las Vegas, Nevada 89155-2610

14 Attorney for Appellant

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Counsel for Respondent

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MATTHEW WASHINGTON
Case No. 65998

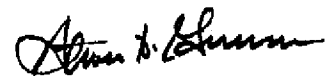
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| 27 | | |
| 28 | | |



CLERK OF THE COURT

NOTC

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

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-VS-

MATTHEW WASHINGTON,
#2685499

Defendant.

CASE NO: C-13-294695-1

DEPT NO: VI

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

TO: MATTHEW WASHINGTON, Defendant; and

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

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

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

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

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

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

//

| 1 | <u>NAME</u> | <u>ADDRESS</u> |
|----|--|----------------------------|
| 2 | ADAMS, TIFFANY - LVMPD P#10072 (or designee): | Expert in the field of DNA |
| 3 | extractions, comparisons, analysis, and the identification of bodily fluids and is expected to | |
| 4 | testify thereto. | |
| 5 | AOYAMA, KATHRYN - LVMPD P#8025 (or designee): LATENT PRINT EXAMINER - | |
| 6 | Expert in the science and techniques of fingerprint comparison, and comparisons done in this | |
| 7 | case and any reports prepared therefrom. | |
| 8 | BAS, JENNIFER - LVMPD P#9944 (or designee): Expert in the field of DNA extractions, | |
| 9 | comparisons, analysis, and the identification of bodily fluids and is expected to testify | |
| 10 | thereto. | |
| 11 | BEAUDETTE, FRAN - LVMPD P#4361 (or designee): Expert in the field of DNA | |
| 12 | extractions, comparisons, analysis, and the identification of bodily fluids and is expected to | |
| 13 | testify thereto. | |
| 14 | BENINCASA, FLOCERFIDA - LVMPD P#10170 (or designee): Expert in the field of | |
| 15 | DNA extractions, comparisons, analysis, and the identification of bodily fluids and is | |
| 16 | expected to testify thereto. | |
| 17 | CAMERON, CATHRYN - LVMPD P#9887 (or designee): LATENT PRINT EXAMINER I | |
| 18 | - Expert in the science and techniques of fingerprint comparison, and comparisons done in | |
| 19 | this case and any reports prepared therefrom. | |
| 20 | CARTER, MARNIE - LVMPD P#8179 (or designee): LATENT PRINT EXAMINER II - | |
| 21 | Expert in the science and techniques of fingerprint comparison, and comparisons done in this | |
| 22 | case and any reports prepared therefrom. | |
| 23 | CROMWELL, MICHAEL - LVMPD P#13203 (or designee): CRIME SCENE ANALYST: | |
| 24 | Expert in the identification, documentation, collection and preservation of evidence and is | |
| 25 | expected to testify as an expert to the identification, documentation, collection and | |
| 26 | preservation of the evidence in this case. | |
| 27 | CUSTODIAN OF RECORDS - CLARK COUNTY DETENTION CENTER | |
| 28 | CUSTODIAN OF RECORDS - LVMPD COMMUNICATIONS | |

1 CUSTODIAN OF RECORDS – LVMPD RECORDS

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

3 FINK, JAMES – LVMPD P#4780

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

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

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

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

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

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

20 HONAKER, JAMIE – DISTRICT ATTORNEY INVESTIGATOR

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

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

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

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

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

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

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

12 MARSCHNER, JULIE – LVMPD P#8806 (or designee): Expert in the field of DNA
13 extractions, comparisons, analysis, and the identification of bodily fluids and is expected
14 MARTIN, TERRY – LVMPD P#5946 (or designee): CRIME SCENE ANALYST: Expert
15 in the identification, documentation, collection and preservation of evidence and is expected
16 to testify as an expert to the identification, documentation, collection and preservation of the
17 evidence in this case.

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

21 MCCARTHY, JASON – LVMPD P#4715

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

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

1 preservation of the evidence in this case.

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

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

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

12 PAIQUETTE, C. – LVMPD P#13937

13 RAETZ, DEAN – LVMPD P#4234

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

17 REVELS, JEROME – DISTRICT ATTORNEY INVESTIGATOR

18 ROGERS, R. – LVMPD P#2858

19 SAHOTA, ERIC – LVMPD P#9932 (or designee): LATENT PRINT EXAMINER II -

20 Expert in the science and techniques of fingerprint comparison, and comparisons done in this
21 case and any reports prepared therefrom.

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

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

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

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

1 pathology and will give scientific opinions related thereto. He is expected to testify
2 regarding the cause and manner of death of NATHAN RAWLS.
3 STONE, RANDALL - LVMPD P#2887 (or designee): FORENSIC LAB MANAGER with
4 the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and
5 toolmark comparisons and is expected to testify thereto.
6 TAYLOR, ERINMARIE - LVMPD P#9619 (or designee): CRIME SCENE ANALYST:
7 Expert in the identification, documentation, collection and preservation of evidence and is
8 expected to testify as an expert to the identification, documentation, collection and
9 preservation of the evidence in this case.
10 THOMAS, JENNIFER - LVMPD P#10074 (or designee): Expert in the field of DNA
11 extractions, comparisons, analysis, and the identification of bodily fluids and is expected to
12 testify thereto.
13 THOMAS, KRISTINA - LVMPD P#13574 (or designee): CRIME SCENE ANALYST:
14 Expert in the identification, documentation, collection and preservation of evidence and is
15 expected to testify as an expert to the identification, documentation, collection and
16 preservation of the evidence in this case.
17 THOMAS, LAROY - 2655 SHERWOOD ST., #18, LVN 89109
18 to testify thereto.
19 VIDA, BEATA - LVMPD P#14279 (or designee): Expert in the field of DNA extractions,
20 comparisons, analysis, and the identification of bodily fluids and is expected to testify
21 thereto.
22 WATTS, JOE - DISTRICT ATTORNEY INVESTIGATOR

23 STEVEN B. WOLFSON
24 District Attorney
Nevada Bar #001565

25 BY /s//DANIELLE K. PIEPER
26 DANIELLE K. PIEPER
27 Chief Deputy District Attorney
28 Nevada Bar #008610

CERTIFICATE OF ELECTRONIC FILING

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

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

Shellie Warner
Secretary for the District Attorney's Office

mmw/GANG

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/30/10

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

Current Discipline of Assignment: Biology/DNA

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

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

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

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-------------------------------------|-----------------|
| Course / Seminar | Location | Dates |
| Courtroom Statistics (workshop) | San Diego, CA | 2006 |
| Bode Technology Advanced DNA Technology Meeting | San Diego, CA | 2006 |
| Expert Witness Testimony (workshop) | St. Louis, MO | 2005 |
| Midwestern Association of Forensic Scientists Annual Meeting | St. Louis, MO | 2005 |
| Hair Examination for DNA Analysts (workshop) | Wilmington, DE | 2004 |
| Mid-Atlantic Association of Forensic Scientists Annual Meeting | Wilmington, DE | 2004 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Grand Jury – Nevada (Clark County) | DNA | 1 |
| District Court – Nevada (Clark County) | DNA | 1 |
| State Attorney 11 th Circuit – Miami-Dade | DNA | 1 |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| Las Vegas Metropolitan Police Department | Forensic Scientist II (Biology/DNA) | 2007-Present |
| Bode Technology | Forensic DNA Analyst II | 2003-2007 |
| PSU College of Medicine/Milton S. Hershey Medical Center | Research Technician II | 2002-2003 |
| RheoGene/Rohm & Haas | Lab Assistant/Intern | 2000-2002 |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |
| None | | |
| PUBLICATIONS / PRESENTATIONS: | | |
| "DNA Laboratory Bailout: No-Cost Methods for Improving Productivity" (Poster Presentation: 2010 Annual Meeting of the American Academy of Forensic Sciences) | | |

PUBLICATIONS / PRESENTATIONS:

"Effects of Sodium Selenite and Organoselenium Compounds on Microtubule Polymerization"
(Poster Presentation: 2002 Annual Meeting of the Pennsylvania Academy of Science)

OTHER QUALIFICATIONS:

None

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/25/10

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

Current Discipline of Assignment: Latent Prints

| EXPERIENCE IN THE FOLLOWING DISCIPLINE(S) | | | |
|---|----------------|--------------------------------------|------------------|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | |
| Latent Prints | X | Crime Scene Investigations | |
| Serology | | Clandestine Laboratory Response Team | |
| Document Examination | | DNA Analysis | |
| Quality Assurance | | Technical Support / | |
| EDUCATION | | | |
| Institution | Dates Attended | Major | Degree Completed |
| University of California, San Diego | 9/84 to 6/89 | Biology | B.A. |
| University of Nevada, Las Vegas | 8/83 to 5/84 | Biology | None |
| ADDITIONAL TRAINING / SEMINARS | | | |
| Course / Seminar | Location | Dates | |
| ASCLD /LAB International Preparation Course | Henderson, NV | 12/01-12/03/09 | |
| Nevada State IAI Tristate Conference – IND/Zn Workshop | Las Vegas, NV | 10/07/09 | |
| Latent Print Certification Preparation | Las Vegas, NV | 06/08-06/10/09 | |
| Analysis of Distortion in Latent Prints | Las Vegas, NV | 02/09-02/10/09 | |
| GWS-L Latent User Methods and Operations | Las Vegas, NV | 09/17-09/18/08 | |
| RUVIS Training | Las Vegas, NV | 8/6/2008 | |
| Application of Statistics to Ridgeology And ACE-V Methodology | Las Vegas, NV | 3/31-4/04/08 | |
| Witnessing 101 - Clark County DA's Office | Las Vegas, NV | 5/9/08 | |

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

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

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

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

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 07/15/10

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

Current Discipline of Assignment: Biology/DNA

| EXPERIENCE IN THE FOLLOWING DISCIPLINE(S) | | | |
|--|--------------------|--------------------------------------|------------------|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | |
| Latent Prints | | Crime Scene Investigations | |
| Serology | X | Clandestine Laboratory Response Team | |
| Document Examination | | DNA Analysis | X |
| Quality Assurance | | Technical Support / | |
| EDUCATION | | | |
| Institution | Dates Attended | Major | Degree Completed |
| Hamline University | 09/1994 - 06/1995 | General | N/A |
| University of Minnesota | 09/1996 - 06/1999 | Genetics and Cell Biology | B.S. |
| George Washington University | 09/2002 - 12/2003 | Forensic Molecular Biology | M.F.S. |
| ADDITIONAL TRAINING / SEMINARS | | | |
| Course / Seminar | Location | Dates | |
| Y-STR Workshop | Huntington, WV | 04/19-04/23/2010 | |
| 20 th International Symposium on Human Identification | Las Vegas, NV | 10/12-10/15/2009 | |
| Validation of New Techniques and Assays in HID | Las Vegas, NV | 10/12/2009 | |
| Presenting DNA Evidence in Court | Las Vegas, NV | 10/12/2009 | |
| Hair Evaluation for DNA Analysts (online course) | Las Vegas, NV | 12/2008 | |
| Kinship Calculations/Familial Searches | Captiva Island, FL | 05/20/2008 | |

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

| <i>Court</i> | <i>Discipline</i> | <i>Number of Times</i> |
|---------------------------------|---------------------------------|------------------------|
| Grand Jury (Clark County, NV) | Forensic Biology & DNA Analysis | 4 |
| Clark County Justice Court, NV | Forensic Biology & DNA Analysis | 2 |
| Clark County District Court, NV | Forensic Biology & DNA Analysis | 9 |
| | | |
| | | |

| EMPLOYMENT HISTORY | | |
|--|-----------------------|-----------------|
| <i>Employer</i> | <i>Job Title</i> | <i>Date</i> |
| Las Vegas Metropolitan Police Department | Forensic Scientist II | 05/07 - Present |
| Armed Forces DNA Identification Laboratory | Forensic Scientist II | 11/05 - 04/06 |
| Armed Forces DNA Identification Laboratory | Forensic Scientist I | 01/04 - 11/05 |

| PROFESSIONAL AFFILIATIONS | |
|--|----------------|
| <i>Organization</i> | <i>Date(s)</i> |
| American Academy of Forensic Sciences - Associate Member | 2005 - Pres. |
| | |

| PUBLICATIONS / PRESENTATIONS: |
|---|
| "DNA Laboratory Bailout: No-Cost Methods for Improving Productivity" (Poster) Tiffany A. Adams, Kristina M. Paulette, Jennifer L. Zimdars Bas. Presented at 62 nd Annual Scientific Meeting of the American Academy of Forensic Sciences – Seattle, WA February 22-27, 2010 |
| "Development and Validation of the AmpF STR ® MiniFiler™ PCR Amplification Kit: a MiniSTR multiplex for the analysis of degraded and/or PCR inhibited DNA" Journal of Forensic Sciences 2008 Jul; 53(4) 838-852 |
| "Evaluation of the Applied Biosystems AmpF STR ® MiniFiler™ PCR Amplification Kit" (POSTER) Jennifer L Zimdars, MFS; Timothy P McMahon, PhD; Demris A Lee, MFS; Maj Louis N. Finelli, MC, USA. Presented at the 17 th International Symposium on Human Identification - Nashville, TN 10/2006 |

| OTHER QUALIFICATIONS: |
|------------------------------|
| None |
| |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 07/06/10

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

Current Discipline of Assignment: Biology / DNA

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

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

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

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

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

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

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

| ADDITIONAL TRAINING / SEMINARS | | |
|-------------------------------------|---|-----------------|
| Course / Seminar | Location | Dates |
| Controlled Substances - Analysis | LVMPD - OJT | 4/92 - 6/92 |
| Forensic Chemistry and Toxicology | Associated Pathologist Laboratory of Las Vegas | Fall 1990 |
| | | |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| U.S. District Court - Nevada | Controlled Substances | 5 |
| U.S. District Court - Nebraska | Controlled Substances | 1 |
| Nevada District Court, 8th District | Controlled Substances | 25 |
| Nevada District Court, 8th District | DNA | 4 |
| Nevada District Court, 5th District | Controlled Substances | 4 |
| Nevada District Court, Juvenile Div | Controlled Substances | 3 |
| Grand Jury, Clark County | DNA | 3 |
| Grand Jury | Controlled Substances | 2 |
| Justice Court, Las Vegas | Controlled Substances | 24 |
| Justice Court, Tonopah | Controlled Substances | 2 |
| Justice Court, Beatty | Controlled Substances | 4 |
| Justice Court, Henderson | Controlled Substances | 2 |
| Justice Court, Pahrump | Controlled Substances | 3 |
| Justice Court, Goldfield | Controlled Substances | 1 |
| US District Court, Nevada | Blood Alcohol | 3 |
| Nevada District Court, 8th District | Blood Alcohol | 3 |
| Justice Court, Las Vegas | Blood Alcohol | 0 |
| Muni Court, Las Vegas | Blood Alcohol | 7 |

| COURTROOM EXPERIENCE | | |
|--|-------------------------------|-----------------|
| Court | Discipline | Number of Times |
| Grand Jury, Clark County | Blood Alcohol | 1 |
| Muni Court, Henderson | Blood Alcohol | 1 |
| Dept. Motor Vehicles, Las Vegas | Blood Alcohol | 25 |
| Nevada District Court, 5 th District | Blood Alcohol | 5 |
| Justice Court, Pioche, NV | Blood Alcohol | 1 |
| | | |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| LVMPD Forensic Laboratory; Las Vegas, NV | Criminalist II | 4/92 - Present |
| Associated Pathologist Laboratory, Las Vegas, NV | Supv. Technologist | 4/89 - 3/92 |
| State of Nevada, Public Health Laboratory | Microbiologist Supervisor | 1/87 - 4/89 |
| Rush Presbyterian St. Luke's Medical Center; Chicago, IL | Supv. Technologist | 7/77 - 11/86 |
| Holy Cross Hospital; Chicago, IL | Phlebotomist / Lab Technician | 8/76 - 7/77 |
| | | |
| | | |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |
| Midwestern Association of Forensic Scientists | 10/92 | |
| | | |
| PUBLICATIONS / PRESENTATIONS: | | |

PUBLICATIONS / PRESENTATIONS:

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

OTHER QUALIFICATIONS:**Professional Licenses:**

American Society of Clinical Pathologists, Registry #MT118248 8/77

State of Nevada Clinical Laboratory Technologist #003738 12/86

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 07/07/10

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

Current Discipline of Assignment: Latent Prints

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

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

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

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

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

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-----------------------|-------------------|
| Course / Seminar | Location | Dates |
| NV State Division of IAI | NSDIAI | 07/27/04 |
| Forensic Photo Techniques | NSDIAI | 04/07/04 |
| Lifting Prints off Textured Surfaces | NSDIAI | 04/07/04 |
| Defensive Tactics - CSA's | LVMPD | 02/02/04 |
| Civilian Use of Force & Firearm Training | LVMPD | 02/03/04-02/05/04 |
| Orientation for Civilian Employees - Advanced Training | LVMPD | 01/22/04-01/30/04 |
| Criminal Law (Capt. T. Hawkins) | LVMPD | 12/04/03 |
| Law Enforcement Response to Alzheimer's (Elderly Abuse/Neglect) | LVMPD | 12/04/03 |
| Driver's Training | LVMPD | 12/01/03 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Grand Jury | Latent Prints | 1 |
| District Court, Clark County | Latent Prints | 2 |
| District Court, Clark County | Crime Scene Analyst | 12 |
| Grand Jury | Crime Scene Analyst | 2 |
| Justice Court, Las Vegas | Crime Scene Analyst | 2 |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| LVMPD | Forensic Scientist II | 03/10 - Present |
| LVMPD | Forensic Scientist I | 03/07 - 03/10 |
| LVMPD | CSA II | 11/05 - 03/07 |
| LVMPD | CSA I | 11/03 - 11/05 |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |

| PROFESSIONAL AFFILIATIONS | |
|---|---------|
| Organization | Date(s) |
| International Association For Identification (IAI) | 10/2004 |
| Nevada State Division of IAI (NSDAI) | 07/2004 |
| PUBLICATIONS / PRESENTATIONS: | |
| 10/06/09-10/08/09 "Fingerprint Alterations – Disguised, Obliterated, And Mutilated", IAI Tri-Divisional Conference, Las Vegas, NV | |
| 09/16/09-09/23/09 Latent Print Training – To LVMPD Gang Unit, Las Vegas, NV | |
| 09/22/09-09/23/09 Latent Print Training – To LVFR Arson/Bomb Squad, Las Vegas, NV | |
| 01/09/09 "Crime Scene Investigations" Criminalistics Class, Advanced Technologies Academy, Las Vegas, NV | |
| 09/22/08 "Latent Print Evidence" LVMPD CSA Academy, Las Vegas, NV | |
| 09/08/08-09/09/08 "Ridge Flows and Crease Patterns of the Palms", LVMPD Forensic Laboratory, Las Vegas, NV | |
| 9/3/08 "Ridge Flows and Crease Patterns of the Palms", Civil Fingerprinting, Las Vegas, NV | |
| 6/11/08 "Historical and Scientific Development of Latent Print Methodologies", LVMPD, Las Vegas, NV | |
| 03/08 "Latent Print Evidence", CSA Academy, LVMPD, Las Vegas, NV | |
| 11/06/07 "Back to Basics: Ridge Flows and Creases of Hands and Feet" Arizona/Nevada/ Utah Tri-State IAI Conference, Salt Lake City, Utah | |
| 11/06/07 "Who Moved My Latent?: Disguised Fabricated and Forged Fingerprints" Arizona/Nevada/ Utah Tri-State IAI Conference, Salt Lake City, Utah | |
| 08/21/07 "Disguising and Disrupting Fingerprints", LVMPD, Las Vegas, NV | |
| 08/07/07 "Distortion in Latent Prints", LVMPD, Las Vegas, NV | |
| 06/14/07 "Ridge Flows and Crease Patterns of the Hands and Feet", LVMPD, Las Vegas, NV | |
| 05/23/07 "Introduction to Latent Print Collection", LVMPD Laughlin Substation, NV | |
| OTHER QUALIFICATIONS: | |
| Certified Latent Print Examiner – IAI, Dec. 2009 | |
| | |

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: Michael Cromwell

P# 13203

Date: 06-22-10

| CURRENT CLASSIFICATION | | |
|---|------------------------------------|---|
| | <i>Classification</i> | <i>Minimum Qualifications</i> |
| X | Crime Scene Analyst I | AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation. |
| X | Crime Scene Analyst II | 18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I. |
| | Senior Crime Scene Analyst | Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst. |
| | Crime Scene Analyst Supervisor | Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field. |
| FORMAL EDUCATION | | |
| <i>Institution</i> | <i>Major</i> | <i>Degree/Date</i> |
| University of Central Florida | Forensic Science w/Chemistry Minor | Bachelor of Science/May 2007 |
| Seminole Community College | General Education | Associates/May 2004 |
| | | |
| | | |
| TESTIMONY | | |
| <i>Yes</i> | <i>No</i> | |
| X | | Clark County, NV – Justice Court |
| X | | Clark County, NV – District Court |
| EMPLOYMENT HISTORY | | |
| <i>Employer</i> | <i>Title</i> | <i>Date</i> |
| LVMPD | CSA II | 03-10-10 to Present |
| LVMPD | CSA I | 03-10-08 to 03-10-10 |
| Baltimore County Police Dept Forensic Services Section | Intern | 01/07 - 02/08 |
| University of Central Florida Department of Chemistry | Research Technician | 05/06 - 12/06 |
| | | |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 02-22-11

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

Current Discipline of Assignment: Firearms/Toolmarks

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

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

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

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

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

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

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

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

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

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

Date: 06/28/10

Name: Kellie M. (Wales) Gauthier

P#: 8691

Classification: Forensic Scientist II

Current Discipline of Assignment: DNA/Biology

| EXPERIENCE IN THE FOLLOWING DISCIPLINE(S) | | | |
|---|-------------------------------|--------------------------------------|------------------|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | |
| Latent Prints | | Crime Scene Investigations | |
| Serology | X | Clandestine Laboratory Response Team | |
| Document Examination | | DNA Analysis | X |
| Quality Assurance | | Technical Support / | X |
| EDUCATION | | | |
| Institution | Dates Attended | Major | Degree Completed |
| University of West Florida | 8/98 - 5/02 | Biology | B.S. |
| ADDITIONAL TRAINING / SEMINARS | | | |
| Course / Seminar | Location | Dates | |
| ASCLD/LAB- International Preparation Course | Henderson, NV | 12/01-12/03/09 | |
| Cold Case Analysis Training | Chicago, IL | 07/15-07/16/09 | |
| Hair Evaluation for DNA Analysis | Las Vegas, NV (Online Course) | 01/14/09 | |
| Annual Review of DNA Data Accepted at NDIS | Las Vegas, NV (Online Course) | 11/18/08 | |
| Seminar: The Parachute Case | Washington DC | 02/22/08 | |
| Seminar: Bringing Forensic Science to the Battlefield | Washington DC | 02/21/08 | |
| Seminar: Human Identification in a Post 9/11 World | Washington DC | 02/20/08 | |

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

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-----------------------|-----------------|
| Course / Seminar | Location | Dates |
| Workshop: Future Trends in Forensic DNA Technology - Applied Biosystems | Orlando, FL | 9/04 |
| Workshop: Southern Association of Forensic Scientists (SAFS) - Paternity Index DNA Statistics | Orlando, FL | 9/04 |
| Workshop: Forensic Epidemiology - Joint Training for Law Enforcement Hazardous Materials and Public Health Officials on Investigative Response to Bio-terrorism | Orlando, FL | 7/04 |
| Forensic Technology Training - Florida Department of Law Enforcement | Orlando, FL | 4/04 |
| Biology Discipline Meeting | Tampa, FL | 3/04 |
| Workshop: Future Trends in Forensic DNA Technology - Applied Biosystems | Orlando, FL | 9/03 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Clark County: Justice, District | DNA | 30 |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| Las Vegas Metropolitan Police Department | Forensic Scientist | 5/05 - present |
| Florida Dept. of Law Enforcement | Forensic Technologist | 8/03 - 5/05 |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |
| American Academy of Forensic Sciences - Trainee Affiliate | 10/06 - 12/09 | |
| PUBLICATIONS / PRESENTATIONS: | | |
| None | | |
| OTHER QUALIFICATIONS: | | |
| None | | |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/20/2012

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

Current Discipline of Assignment: Latent Prints

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

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

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

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

| COURTROOM EXPERIENCE | | |
|---|------------------------------------|---------------------|
| Court | Discipline | Number of Times |
| District Court, Nevada | Latent Prints | 2 |
| | | |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| Las Vegas Metropolitan Police Department | Forensic Scientist | 03/05/12 - Present |
| Las Vegas Metropolitan Police Department | Forensic Scientist Trainee | 03/05/11 – 03/05/12 |
| Las Vegas Metropolitan Police Department | Forensic Lab Technician | 06/02/07 – 03/05/11 |
| Las Vegas Metropolitan Police Department | Law Enforcement Support Technician | 02/28/07-06/02/07 |
| | | |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |
| International Association for Identification (IAI) | 2007-present | |
| Southwestern Association of Forensic Scientists (SWAFS) | 2010-present | |
| PUBLICATIONS / PRESENTATIONS: | | |
| 8/31/11 "Thermal Paper Processing" 25 th Annual AFIS Internet User Conference, Henderson, NV | | |
| | | |
| OTHER QUALIFICATIONS: | | |
| IAI Certified Latent Print Examiner – November 30, 2010 | | |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/28/10

Name: Edward S. Guenther

P#: 5891

Classification: Forensic Scientist II

Current Discipline of Assignment: Latent

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

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

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

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

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

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

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

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

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

| PUBLICATIONS / PRESENTATIONS: |
|-------------------------------|
| None |

| OTHER QUALIFICATIONS: |
|-----------------------|
| |

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

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 10/27/10

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

Current Discipline of Assignment: Latent Prints

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

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

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

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-----------------------------|-------------------|
| Course / Seminar | Location | Dates |
| Analysis of Distortion in Latent Prints | Las Vegas, NV | 02/09/09-02/10/09 |
| NEC AFIS Training - GWS-L Latent user Methods and Operations | Las Vegas, NV | 09/17/08-09/18/08 |
| IAI 93 rd Educational Conference | Louisville, KY | 08/18/08-08/22/08 |
| Application of Statistics to Ridgeology and the ACE-V Methodology | Las Vegas, NV | 03/31/08-04/04/08 |
| Forensic Ridgeology | Las Vegas, NV | 02/18/08-02/22/08 |
| Forensic Photography Workshop | Las Vegas, NV | 02/11/08-02/13/08 |
| Forensic Imaging Techniques | Las Vegas, NV | 01/07/08-01/09/08 |
| Finding Latent Evidence with Chemistry and Light – Ron Smith and Associates | Henderson, NV | 12/11/07-12/14/07 |
| Advanced Palm Print Comparison Techniques | Fresno, CA | 11/13/07-11/15/07 |
| SCAFO 16 th Annual Forensic Training Seminar | Riverside, CA | 10/01/07-10/02/07 |
| IAI 92 nd International Educational Conference | San Diego, CA | 07/22/07-07/28/07 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Eight Judicial District Court | Latent Print Examination | 2 |
| | | |
| | | |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| Las Vegas Metropolitan Police Department | Forensic Scientist | 3/07-Present |
| Clark County School District | High School Science Teacher | 8/03 - 3/07 |
| Lockheed Analytical Laboratory | Senior Associate Scientist | 1/93 - 6/97 |
| Associated Pathologist's Laboratories | Veterinary Lab Technician | 1/92 - 1-93 |
| PROFESSIONAL AFFILIATIONS | | |

| Organization | Date(s) |
|--|---------------|
| International Association of Identification | 06/07-present |
| AFIE Internet Inc. | 07/10-present |
| PUBLICATIONS / PRESENTATIONS: | |
| Presentations: | |
| 08/08/10-08/12/10 "How Much Is Enough: Exploring 'Of Value' Decisions and Borderline Latent Print," 24 th Annual AFIS Internet User's Group Conference, Portland, OR | |
| 07/13/10-07/16/10 "Analysis of Distortion In Latent Prints," 95 th IAI Educational Conference, Spokane, WA | |
| 07/13/10-07/16/10 "How Much Is Enough: Exploring 'Of Value' Decisions and Borderline Latent Prints," 95 th IAI Educational Conference, Spokane, WA | |
| 09/02/09 "Things Aren't Always as They Appear – Examining Forged and Fraudulent Fingerprints," 23 rd Annual AFIS Internet NEC User's Group Conference, Sacramento, CA | |
| 09/01/09 "Examining the NAS Report: A Fingerprint Examiner's Perspective," 23 rd Annual AFIS Internet NEC User's Group Conference, Sacramento, CA | |
| 09/01/09 "Basic Fingerprint Distortion for the Ten Print Examiner," 23 rd Annual AFIS Internet NEC User's Group Conference, Sacramento, CA | |
| 09/24/08 "Hidden Evidence – Finding Latent Prints with Chemistry", American Chemical Society Western Regional Conference, Las Vegas, NV | |
| 09/08/08-09/09/08 "Friction Ridge Flow and Creases of the Palm Training," LVMPD Forensic Laboratory, Las Vegas, NV | |
| 09/03/08 "Creases and Friction Ridge Flow of the Palm," civil Fingerprinting, Las Vegas, NV | |
| 08/18/08 "Valid Science or Voodoo – Testing Latent Print Methodology," 93 rd IAI Educational Conference, Louisville, KY | |
| 12/07 Fingerprint Examination Lecture and Workshop, Forensic Science Class, Shadow Ridge High School, Las Vegas, NV | |
| 11/06/07 "Back to Basics: Ridge Flows and Creases of Hands and Feet" Arizona/Nevada/ Utah Tri-State IAI Conference, Salt Lake City, Utah | |
| 11/06/07 "Who Moved My Latent?: Disguised Fabricated and Forged Fingerprints" Arizona/Nevada/ Utah Tri-State IAI Conference, Salt Lake City, Utah | |
| Publications: | |

PUBLICATIONS / PRESENTATIONS:

Merlino, M., Springer, V., Seaman-Kelly, J., Hammond, D., Sahota, E., and **Haines, L.** "Meeting the Challenges of the Daubert Trilogy: Refining and Redefining the Reliability of Forensic Evidence", Tulsa Law Review, 2007, 43(2), p. 417-445.

Branum, G., Sweeney, S., Palmeri, A., Haines, L., and Huber, C. "The Feasibility of the Detection and Quantitation of β -Adrenergic Blockers by Solid-Phase Extraction and Subsequent Derivatization with Methaneboronic Ac, Journal of Analytical Toxicology, March/April 1998, Vol. 22, Number 2, pp. 135-141.

OTHER QUALIFICATIONS:

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 12/14/10

Name: David Johnson

P#: 9933

Classification: Forensic Scientist II

Current Discipline of Assignment: Latent Prints

| EXPERIENCE IN THE FOLLOWING DISCIPLINE(S) | | | |
|--|----------------|--------------------------------------|------------------|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | |
| Latent Prints | X | Crime Scene Investigations | |
| Serology | | Clandestine Laboratory Response Team | |
| Document Examination | | DNA Analysis | |
| Quality Assurance | | Technical Support / | |
| EDUCATION | | | |
| Institution | Dates Attended | Major | Degree Completed |
| University of California, Riverside | 9/99-8/03 | Biology | BS |
| | | | |
| ADDITIONAL TRAINING / SEMINARS | | | |
| Course / Seminar | Location | Dates | |
| NEDIAI 18 th Annual Educational Conference | Manchester, VT | 11/09/10-11/12/10 | |
| Photoshop CS5 | Las Vegas, NV | 08/31/10 | |
| Forensic Fingerprint Analysis Basics | Las Vegas, NV | 08/25/10 | |
| IAI 95 th Educational Conference | Spokane, WA | 07/11/10-07/17/10 | |
| Paper Chemistry, Oil Red O, and Physical Developer | Las Vegas, NV | 10/09/09 | |
| The Development of Latent Prints on Porous Surfaces Using 1,2-IND-Zn | Las Vegas, NV | 10/08/09 | |
| Writing for Publication | Las Vegas, NV | 06/17/09 | |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|----------------|---------------------|
| Course / Seminar | Location | Dates |
| Probability Based Fingerprint Examination – Fingerprinting in the 21 st Century | Las Vegas, NV | 06/15/09-06/16/09 |
| Analysis of Distortion in Latent Prints | Las Vegas, NV | 02/09/09-02/10/09 |
| GWS-L Latent user Methods and Operations | Las Vegas, NV | 09/17/09-09/18/08 |
| IAI 93 rd Educational Conference | Louisville, KY | 08/17/08-08/23/08 |
| LVMPD Latent Print Training Program | Las Vegas, NV | 03/26/07-07/14/08 |
| PNWD-IAI Education & Training Conference | Medford, OR | 05/13/08-05/16/08 |
| Witnessing 101 | Las Vegas, NV | 05/09/08 |
| Application of Statistics to Ridgeology and ACE-V Methodology | Las Vegas, NV | 03/31/08 – 04/04/08 |
| Forensic Ridgeology | Las Vegas, NV | 02/18/08 – 02/22/08 |
| Forensic Photography | Las Vegas, NV | 02/11/08 – 02/13/08 |
| Forensic Imaging Techniques | Las Vegas, NV | 01/07/08 – 01/09/08 |
| Finding Latents with Chemistry and Light | Henderson, NV | 12/12/07 - 12/15/07 |
| Advanced Palm Print Comparison Techniques | Fresno, CA | 11/13/07 - 11/15/07 |
| Introduction to Firearms Safety | Las Vegas, NV | 10/24/07 |
| SCAFO Training Seminar | Riverside, CA | 10/01/07 – 10/2/07 |
| IAI 92 nd Educational Conference | San Diego, CA | 7/23/07 - 7/27/07 |
| Driver Training | Las Vegas, NV | 07/05/07 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Clark County District Court | Latent Prints | 8 |
| Federal Court (Nevada) | Latent Prints | 1 |
| Clark County Grand Jury | Latent Prints | 1 |
| EMPLOYMENT HISTORY | | |

| <i>Employer</i> | <i>Job Title</i> | <i>Date</i> |
|--|----------------------------|-----------------|
| LVMPD Forensic Laboratory | Forensic Scientist II | 03/10 – present |
| LVMPD Forensic Laboratory | Forensic Scientist I | 03/08 – 03/10 |
| LVMPD Forensic Laboratory | Forensic Scientist Trainee | 03/07- 03/08 |
| PROFESSIONAL AFFILIATIONS | | |
| <i>Organization</i> | | <i>Date(s)</i> |
| International Association for Identification (IAI) | | 2007-present |
| PUBLICATIONS / PRESENTATIONS: | | |
| Presentations: | | |
| 11/12/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" NEDIAI 18 th Annual Educational Conference, Manchester, VT | | |
| 11/12/10 "Ridge Flows of the Feet" NEDIAI 18 th Annual Educational Conference, Manchester, VT | | |
| 11/11/10 "Aging and Wound Healing of the Skin" NEDIAI 18 th Annual Educational Conference, Manchester, VT | | |
| 10/28/10-10/29/10 "Analysis of Distortion in Latent Prints" San Diego, CA | | |
| 10/18/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" Indiana IAI 17 th Annual Conference, Fort Wayne IN | | |
| 07/16/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" IAI 95 th Educational Conference, Spokane, WA | | |
| 07/15/10 "Ridge Flows of the Feet" IAI 95 th Educational Conference, Spokane, WA | | |
| 07/15/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" IAI 95 th Educational Conference, Spokane, WA | | |
| 07/13/10 "Ridge Flows of the Feet" IAI 95 th Educational Conference, Spokane, WA | | |
| 07/13/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" IAI 95 th Educational Conference, Spokane, WA | | |
| 05/27/10 "Analysis of Distortion in Latent Prints" CSDIAI 2010 Annual Training Seminar, Rancho Mirage, CA | | |
| 10/08/09 "Ridge Flows of the Feet" 4 th Tri-Division Educational Conference, Las Vegas, NV | | |
| 10/07/09 "Ridge Flows of the Feet" 4 th Tri-Division Educational Conference, Las Vegas, NV | | |

PUBLICATIONS / PRESENTATIONS:

9/22/08 "Latent Print Evidence", CSA Academy, LVMPD, Las Vegas, NV

8/22/08 "Ridge Flows of the Feet" IAI 93rd Educational Conference, Louisville, KY8/21/08 "Ridge Flows of the Feet" IAI 93rd Educational Conference, Louisville, KY8/19/08 "Ridge Flows of the Feet" IAI 93rd Educational Conference, Louisville, KY

07/21/08-7/25/08 "Ridgeology Science Workshop" Pretoria, South Africa

6/11/08 "Historical and Scientific Development of Latent Print Methodologies", LVMPD, Las Vegas, NV

05/08 "Aging and Wound Healing of the Friction Ridge Skin", PNWDIAI, Medford, OR

05/08 "Disguised and Disrupted Fingerprints", PNWDIAI, Medford, OR

05/08 "Ridge Flows and Crease Patterns of the Feet", PNWDIAI, Medford, OR

05/08 "Analysis of Distortion in Latent Prints", PNWDIAI, Medford, OR

04/08 "Ridge Flows and Crease Patterns of the Feet", SWGFAST, Huntsville, TX

3/08 "Latent Print Evidence", CSA Academy, LVMPD, Las Vegas, NV

1/16/08 "Introduction to Latent Print Collection", LVMPD Laughlin Substation, NV

8/21/07 "Disguising and Disrupting Fingerprints", LVMPD, Las Vegas, NV

8/7/07 "Distortion in Latent Prints", LVMPD, Las Vegas, NV

6/14/07 "Ridge Flows and Crease Patterns of the Hands and Feet", LVMPD, Las Vegas, NV

OTHER QUALIFICATIONS:

Certified Latent Print Examiner through the International Association for Identification since 9/2009

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 01/25/11

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

Current Discipline of Assignment: Biology/DNA

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

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

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

| ADDITIONAL TRAINING / SEMINARS | | |
|---|------------------------|-----------------|
| Course / Seminar | Location | Dates |
| Advanced Topics in STR DNA | | |
| AAFS 58 th ANNUAL MEETING | Seattle, WA | 2/06 |
| AAFS 57 th ANNUAL MEETING | New Orleans, LA | 2/05 |
| 14 th Internat'l. Symposium on Human Identification | Phoenix, AZ | 10/03 |
| AAFS 55 TH ANNUAL MEETING | Chicago, IL | 2/03 |
| Forensic Mitochondrial DNA Analysis: A Community Forum Workshop Recovery, Examination, and Evidence of Decomposed and Skeletonized Bodies: An Anthropological and Entomological Approach Workshop | | |
| AAFS 54 TH Annual Meeting | Atlanta, GA | 2/02 |
| Forensic Imaging Techniques | Las Vegas, NV | 01/08 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Las Vegas District Court | DNA | 2 |
| | | |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| LVMPD | Forensic Scientist II | 01/11-Present |
| DAE Systems | Forensic Scientist III | 10/09-01/11 |
| LVMPD | Forensic Scientist II | 05/07-10/09 |
| American Registry of Pathology/Armed Forces DNA Identification Laboratory | Forensic Scientist II | 08/03-05/07 |
| American Registry of Pathology/Armed Forces DNA Identification Laboratory | Forensic Scientist I | 07/01- 08/03 |
| | | |

| PROFESSIONAL AFFILIATIONS | |
|---------------------------|---------|
| Organization | Date(s) |
| None | |

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

| OTHER QUALIFICATIONS: |
|-----------------------|
| None |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 07/01/10

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

Current Discipline of Assignment: Firearms / Toolmarks

| EXPERIENCE IN THE FOLLOWING DISCIPLINE(S) | | | |
|---|-----------------|--------------------------------------|------------------|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | X | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | X |
| Latent Prints | X | Crime Scene Investigations | X |
| Serology | | Clandestine Laboratory Response Team | |
| Document Examination | | DNA Analysis | |
| Quality Assurance | | Technical Support | |
| EDUCATION | | | |
| Institution | Dates Attended | Major | Degree Completed |
| California State University, Long Beach | 9/76 - 12/80 | Criminalistics | B.S. |
| ADDITIONAL TRAINING / SEMINARS | | | |
| Course / Seminar | Location | Dates | |
| Benelli Shotgun Armorer's Course | Las Vegas, NV | 06/10 | |
| Association of Firearm & Toolmark Examiners (AFTE) Annual Training | Las Vegas, NV | 05/10 | |
| Introduction to Cartridge Reloading (AFTE) | Las Vegas, NV | 05/10 | |
| Scientific Working Group for Firearms/Toolmarks (SWGgun) Meeting | Baton Rouge, LA | 04/10 | |
| Shooting, Hunting, Outdoor Trade (SHOT) Show | Las Vegas, NV | 01/10 | |
| American Society of Crime Laboratory Directors Laboratory Accreditation Board (ASCLDLAB) International Accreditation Preparation Course | Henderson, NV | 12/09 | |
| Association of Firearm & Tool Mark Examiners (AFTE) Annual Training | Miami, FL | 06/09 | |
| Silencer Course (AFTE) | Miami, FL | 06/09 | |
| Innov-X Systems XRF Training | Las Vegas, NV | 08/08 | |

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

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

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

| ADDITIONAL TRAINING / SEMINARS | | |
|--|---------------|-----------------|
| Course / Seminar | Location | Dates |
| AFTE Annual Training Seminar | Seattle, WA | 1988 |
| Washington State Patrol Leaf Marijuana Identification | Shelton, WA | 09/87 |
| FBI: Advanced Latent Fingerprint Techniques | Seattle, WA | 12/86 |
| Loctite Corp. Cyanoacrylate Fuming for Latent Fingerprint Techniques | | 06/85 |
| IAI Pacific Northwest Division Training Seminar | Olympia, WA | 05/85 |
| FBI: Fingerprint Identification | Seattle, WA | 12/84 |
| (AFTE) Annual Training Seminar | San Mateo, CA | 1983 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Federal Court: Washington (Tacoma) | Latent Prints | 1 |
| Municipal Court: California (Orange County) | Latent Prints | 5 |
| Superior Court: California (Orange County) | Latent Prints | 2 |
| Superior Court: Washington (King & Pierce Counties) | Latent Prints | 11 |
| Federal Court: Nevada (Las Vegas) | Firearms | 2 |
| District Court: Nevada (Clark and Nye Counties) | Firearms | 115 |
| Coroner's Inquest : Nevada (Clark County) | Firearms | 5 |
| Grand Jury: Nevada (Clark County) | Firearms | 14 |
| Justice Court: Nevada (Las Vegas, North Las Vegas and Henderson) | Firearms | 10 |
| Federal Grand Jury: Washington (King County) | Firearms | 1 |
| Superior Court: Washington (Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, King, Kitsap, Klicitat, Lewis, Mason, Pacific, Pierce, San Juan, Skamania, Snohomish, and Thurston Counties) | Firearms | 110 |
| District Court: Washington (Pacific County) | Firearms | 1 |
| Juvenile Court: Washington (Pierce and King Counties) | Firearms | 4 |
| Coroner's Inquest: Washington (King County) | Firearms | 4 |
| Superior Court: California (Orange County) | Firearms | 11 |
| Juvenile Court: California (Orange County) | Firearms | 1 |
| Grand Jury: California (Orange County) | Firearms | 1 |

| COURTROOM EXPERIENCE | | |
|-----------------------------------|-------------------|------------------------|
| <i>Court</i> | <i>Discipline</i> | <i>Number of Times</i> |
| Military Court: USMC El Toro (CA) | Firearms | 1 |

| EMPLOYMENT HISTORY | | |
|--|---------------------------|----------------|
| <i>Employer</i> | <i>Job Title</i> | <i>Date</i> |
| Las Vegas Metropolitan Police Department | Forensic Scientist II | 1998 - present |
| Washington State Patrol | Forensic Scientist 3 | 1991 - 1998 |
| Pierce County Sheriff's Department | Identification Officer | 1986 - 1991 |
| Seattle Police Department | Identification Technician | 1984 - 1986 |
| Orange County Sheriff's Department | Forensic Specialist | 1981 - 1984 |
| Anaheim Police Department | Identification Technician | 1981 |

| PROFESSIONAL AFFILIATIONS | |
|---|----------------|
| <i>Organization</i> | <i>Date(s)</i> |
| Association of Firearm and Toolmark Examiners (AFTE) | 1993 - present |
| Scientific Working Group for Firearms and Toolmarks (SWGUN) | 2002 - 2008 |

| PUBLICATIONS / PRESENTATIONS: |
|--|
| <i>BRI 12 GA/.500 Sabot Bullet - AFTE Journal - October 1983</i> |
| <i>Trigger Pull Statistics - AFTE Journal - January 1985</i> |
| <i>Drop Testing a 45 Auto Colt 1911 - AFTE Journal - Spring 1997</i> |
| <i>Cartridge Interchangeability in a Norinco Pistol - AFTE Journal - Summer 2000</i> |
| <i>Slide Failure of a Jennings/Bryco Pistol - AFTE Journal - Spring 2004</i> |
| <i>Armcor Precision Strike Three Ammunition - AFTE Journal - Summer 2004</i> |

| OTHER QUALIFICATIONS: |
|--|
| AFTE Certification in Firearm Evidence Examination and Identification - May 2003 |
| AFTE Certification in Toolmark Evidence Examination and Identification - May 2003 |
| AFTE Certification in Gunshot Residue Evidence Examination and Identification - May 2003 |
| AFTE Distinguished Member - June 2006 |
| AFTE President - 2009 to 2010 |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
CURRICULUM VITAE**

Date: 11/26/13

Name: Anya Lester P#: 13771 Classification: Forensic Scientist II

Current Discipline of Assignment: Firearms and Toolmarks

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

| EDUCATION | | | |
|---------------------------------|----------------|--|---------------------|
| Institution | Dates Attended | Major | Degree Completed |
| Oakland Fire Training Institute | 2004-2005 | Firefighter I and II | Certification, 2005 |
| Henry Ford Community College | 1998-2000 | Emergency Medical Services - Paramedic | Certification, 2000 |
| Edinboro University | 1995-1997 | Biology | Graduate courses |
| Michigan State University | 1989-1994 | Forensic Science | B.S., 1994 |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|-----------------|--------------------|
| Course / Seminar | Location | Dates |
| Toolmark Identification and Comparison Training | Ammendale, MD | 07/30 - 08/03/2012 |
| Southern CA Firearms Study Group - BB and Airsoft Training | Los Angeles, CA | 12/08/2011 |
| Hi-Point Firearms Armorer's Course | Chicago, IL | 06/03/2011 |
| BATFE Machine Gun Conversions/Silencers workshop | Chicago, IL | 06/02/2011 |
| AFTE Annual Training Seminar | Chicago, IL | 05/29-06/03/2011 |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|----------------------------|-------------------|
| Course / Seminar | Location | Dates |
| Basic Shooting Reconstruction Course | Las Vegas, NV | 01/24/11-01/26/11 |
| ATF Serial Number Restoration Course | Las Vegas, NV | 09/27/10-09/29/10 |
| Colt .45/Model "O" and Colt M16/AR-15 Armorer's School | Las Vegas, NV | 08/02/10-08/07/10 |
| LAR Manufacturing Factory Tour | West Jordan, UT | 07/14/10 |
| North American Arms Factory Tour | Provo, UT | 07/13/10 |
| Barnes Bullets Ammunition Factory Tour | Mona, UT | 07/13/10 |
| Sig Sauer Classic Pistols Amorer's School | Las Vegas, NV | 07/07/10-07/08/10 |
| Sturm Ruger Firearms Factory Tour | Prescott, AZ | 06/19/10 |
| Dillon Precision Reloading Factory Tour | Scottsdale, AZ | 06/18/10 |
| Schneider Rifle Barrels Factory Tour | Payson, AZ | 06/18/10 |
| Benelli M1, M2, M4 Armorer's School | Las Vegas, NV | 06/16/10-06/17/10 |
| Beretta 90 Series and Px4 Armorer's School | Las Vegas, NV | 06/14/10-06/15/10 |
| AFTE Annual Training Seminar | Henderson, NV | 05/02/10-05/07/10 |
| Innov-x XRF Safety and Operator Training | Las Vegas, NV | 04/08/10 |
| ATF IBIS Data Acquisition Training | Largo, FL | 01/24/10-01/29/10 |
| Glock Armorer's School | Las Vegas, NV | 01/20/10 |
| | | |
| | | |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Clark County District Court | Firearms Identification | 3 |
| | | |
| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| Las Vegas Metropolitan Police Department | Forensic Scientist I/II | 10/2010 - present |
| Las Vegas Metropolitan Police Department | Forensic Scientist Trainee | 10/2009-10/2010 |
| Las Vegas Metropolitan Police Department | Forensic Laboratory Aide | 12/2008-10/2009 |

| EMPLOYMENT HISTORY | | |
|---|---|-------------------|
| <i>Employer</i> | <i>Job Title</i> | <i>Date</i> |
| College of Southern Nevada | American Heart Association Training Center Coordinator | 11/2006-12/2008 |
| College of Southern Nevada | Part-Time Instructor Healthcare Continuing Education | 11/2006 - present |
| Oakland Community College | Laboratory Paraprofessional – Forensic Science and EMS Labs | 2001-2006 |
| Oakland Community College | Adjunct Faculty – Medical Terminology and EMS | 2001-2006 |
| | | |
| PROFESSIONAL AFFILIATIONS | | |
| <i>Organization</i> | <i>Date(s)</i> | |
| Association of Firearm and Toolmark Examiners (AFTE) – Provisional Member | 07/2011-present | |
| | | |
| | | |
| PUBLICATIONS / PRESENTATIONS: | | |
| Poster Presentations, "Evaluation of the Forensics Source Short Length Ballistic Fiber Filled Bullet Catcher," "Remington HD Ultimate Home Defense 12 Gauge Shot Shell Ammunition," "Sub-Caliber Shenanigans," and "Proof of Concept (Preliminary) Results on a Method to Cross Check Chronograph Velocities Using Hi-Speed Video Camera," Association of Firearm and Tool Mark Examiners Annual Training Seminar, May 2010 | | |
| Accepted Presenter, "How the College of Southern Nevada Met Community Needs Using the American Heart Association Programs for Healthcare Professionals", National Council for Workforce Education Conference, Fall 2007 | | |
| Advanced Cardiac Life Support Presenter, Symposium on Emergency, Trauma, and Critical Care Medicine, Spring 2007 | | |
| Presenter Michigan EMS EXPO, "Pediatric IV/IO 'When You're More Scared Than They Are'", "Advanced Airway Seminar", "Advanced Patient Assessment", 2004, 2005, 2006 | | |
| | | |
| OTHER QUALIFICATIONS: | | |
| HAZMAT Awareness and Operations Certified | | |
| Certified Paramedic, Certified Firefighter I and II – State of MI | | |
| American Heart Association Instructor Certified – CPR and First Aid | | |
| AHA Emergency Cardiac Care Regional Task Force Member, 2006-2012 | | |

AHA Training Center Faculty Member, 2006-present

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: LYNCH, Shandra

P# 13206

Date: 04/04/13

| CURRENT CLASSIFICATION | | |
|-------------------------------|--------------------------------|---|
| | <i>Classification</i> | <i>Minimum Qualifications</i> |
| | Crime Scene Analyst I | AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation. |
| | Crime Scene Analyst II | 18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I. |
| X | Senior Crime Scene Analyst | Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst. |
| | Crime Scene Analyst Supervisor | Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field. |

| FORMAL EDUCATION | | |
|------------------------------|----------------------------------|--------------------------------------|
| <i>Institution</i> | <i>Major</i> | <i>Degree/Date</i> |
| George Washington University | Crime Scene Investigations | Master of Forensic Science/ Jan 2008 |
| University of Tennessee | Biochemistry & Molecular Biology | Bachelor of Science/ May 2006 |
| University of Tennessee | Anthropology | Bachelor of Arts/May 2005 |
| University of Tennessee | Psychology | Bachelor of Arts/Dec 2001 |

| TESTIMONY | | |
|------------------|-----------|---|
| <i>Yes</i> | <i>No</i> | |
| X | | District Court, Justice Court, Grand Jury |
| | | |

| EMPLOYMENT HISTORY | | |
|--|---------------------------------------|----------------------|
| <i>Employer</i> | <i>Title</i> | <i>Date</i> |
| LVMPD | Senior CSA | 06-23-12 to Present |
| LVMPD | CSA II | 03-10-10 to 06-23-12 |
| LVMPD | CSA I | 03-10-08 to 03-10-10 |
| US Secret Service/Sparks Personnel Service | Forensic Services Division Contractor | 01/07 - 02/08 |
| Naval Criminal Investigative Service | Forensic Consultant Division Intern | 08/07 - 12/07 |
| Central Leasing | Sales Associate | 11/04 - 07/06 |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/24/10

Name: Alice V. Maceo P#: 7828 Classification: Forensic Lab Manager

Current Discipline of Assignment: Management of the Latent Print Detail

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

| EDUCATION | | | |
|---------------------------------|----------------|---------|------------------|
| Institution | Dates Attended | Major | Degree Completed |
| University of Alaska, Anchorage | 1/92 - 8/94 | Biology | BS |
| St. Mary's College of Maryland | 9/90 - 12/91 | Biology | |
| | | | |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|----------------------------------|------------------|
| Course / Seminar | Location | Dates |
| Leadership Development | Las Vegas, NV | 1/5 - 1/6/10 |
| Diversity | Las Vegas, NV | 12/16/09 |
| ASCLD/LAB-International Preparation Course | Henderson, NV | 12/1 - 12/3/09 |
| Leadership Development | Las Vegas, NV | 11/17 - 11/18/09 |
| Introduction to Mathematical Statistics | California State University - LB | 8/3 - 9/9/09 |
| IAI 94 th Educational Conference | Tampa, FL | 8/17 - 8/21/09 |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|--|------------------|
| Course / Seminar | Location | Dates |
| Fingerprints and Probability | Nokesville, VA | 7/13 - 07/17/09 |
| Introduction to Statistics | UNLV, Las Vegas, NV | 6/1 - 7/2/09 |
| HFACS/HFIX Super-user Training | Las Vegas, NV | 6/12/09 |
| HFACS/HFIX Two-day Basic Training | Las Vegas, NV | 6/10 - 6/11/09 |
| Forensic Science for the 21 st Century, ASU | Tempe, AZ | 4/3/09 - 4/4/09 |
| IAI 93 rd Educational Conference | Louisville, KY | 8/18 - 8/22/08 |
| Application of Statistics to Ridgeology And ACE-V Methodology | Las Vegas, NV | 03/31 - 04/04/08 |
| Forensic Imaging Techniques | Las Vegas, NV | 01/08 |
| The Management Conference | Las Vegas, NV | 12/13/07 |
| The Women's Conference | Las Vegas, NV | 10/22/07 |
| Interpersonal Communication Skills for Business Professionals | Las Vegas, NV | 10/9 - 10/10/07 |
| The Biometric Consortium Conference | Baltimore, MD | 9/11 - 9/13/07 |
| Managing Emotions Under Pressure | Las Vegas, NV | 9/10/07 |
| IAI 92 nd Educational Conference | San Diego, CA | 7/23 - 7/27/07 |
| Indiana University Expert Cognitive Psychology Study | Bloomington, Indiana | 5/17 - 5/20/07 |
| The Paradigm Shift in Forensic Sciences | Las Vegas, NV | 11/9 - 11/10/06 |
| ASCLD Meeting | San Francisco, CA | 10/2 - 10/5/06 |
| Management Problems of the Technical Person in a Leadership Role | Las Vegas, NV | 9/11/06 |
| Forensic Digital Imaging | Thornton, CO | 7/24 - 7/26/06 |
| IAI 91 st Educational Conference | Boston, MA | 7/3 - 7/7/06 |
| International Symposium on Fingerprints | Interpol Headquarters, Lyon, France | 5/17 - 5/18/06 |
| Indiana University Latent Print Research Consulting Meeting | Bloomington, Indiana | 5/15 - 5/16/06 |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|---|-------------------|
| Course / Seminar | Location | Dates |
| NIST Latent Testing Workshop | Gaithersburg, MD | 4/5 - 4/6/06 |
| Workshop on Ethical and Social Implications of Biometric Identification Technology: Towards and International Approach | European Commission on Science and Society, Brussels, Belgium | 12/15 -12/16/05 |
| New England Division IAI Educational Conference | Burlington, VT | 11/2/05 - 11/4/05 |
| ANSI/NIST Fingerprint Standard Update | Gaithersburg, MD | 4/26 - 4/28/05 |
| Fingerprint Society Lectures 30 th Annual Conference | Brighton, England | 3/18 - 3/20/05 |
| Daubert and The Comparative Sciences | Las Vegas, NV | 10/29 - 10/30/04 |
| Team Building is for Everyone | Las Vegas, NV | 9/28/04 |
| IAI 89 th Educational Conference | St. Louis, MO | 8/23 - 8/27/04 |
| Problem Solving, Independent Decision Making Alt | Las Vegas, NV | 8/12/04 |
| Indiana University Expert Cognitive Psychology Study | Bloomington, Indiana | 12/15/03 |
| Indiana Division IAI Training Conference | Indianapolis, Indiana | 10/21 -10/23/03 |
| IAI 88 th Educational Conference | Ottawa, Ontario Canada | 7/7 - 7/11/03 |
| Driver's Training | Las Vegas, NV | 4/17/03 |
| 28 th Annual Educational Conference of Fingerprint Society | Oxford, England | 3/7 - 3/9/03 |
| FW21 and LEXS Upgrade User Methods and Operations | NEC, Las Vegas, NV | 2/5/03 |
| Southern California Association of Fingerprint Officers (SCAFO) Meeting | West Covina, CA | 10/11- 10/12/02 |
| IAI 87 th Educational Conference | Las Vegas, NV | 8/4 - 8/10/02 |
| "The Daubert World: Past, Present, and Future" | Las Vegas, NV | 6/21 - 6/23/02 |
| Physical Fracture Match Workshop | Arlington, TX | 12/01 |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-----------------------|------------------|
| Course / Seminar | Location | Dates |
| The Fingerprint Society Centennial Conference on Identification | London, England | 6/25 - 6/29/01 |
| Crime Scene Reconstruction | Miami, FL | 9/00 |
| IAI 85 th Educational Conference | Charleston, WV | 7/23 - 7/29/00 |
| Latent Print Searches in AFIS 21 | Anchorage, AK | 6/21 - 6/22/00 |
| Combined Advanced Ridgeology, Demystifying Palm Prints and Comparison Techniques: Research and Graduate Assistant | Salem, Oregon | 10/18 - 10/29/99 |
| IAI 84 th Educational Conference | Milwaukee, WI | 7/11 - 7/17/99 |
| Investigative Photography - Intermediate Level | Anchorage, AK | 4/99 |
| Administrative Advanced Latent Fingerprint School | Quantico, VA | 3/8 - 3/26/99 |
| Bloodstain Pattern Analysis | Miami, FL | 12/98 |
| Combined Advanced Ridgeology, Demystifying Palm Prints and Comparison Techniques | Meridian, Mississippi | 10/26 - 11/6/98 |
| Crime Scene Investigation II | Miami, FL | 8/98 |
| Advanced Ridgeology Comparison Techniques | Mesa, AZ | 5/4 - 5/8/98 |
| Mastering Expert Testimony | Mesa, AZ | 4/27 - 5/1/98 |
| Crime Scene Investigation | Miami, FL | 2/98 |
| Methods of Instruction | Anchorage, AK | 1/12 - 1/16/98 |
| Photography | Anchorage, AK | 11/13/97 |
| Latent Fingerprint Development | Anchorage, AK | 6/3 - 6/5/97 |
| Uniform Investigator Training | Anchorage, AK | 5/19 - 5/22/97 |

| COURTROOM EXPERIENCE | | |
|---|---------------------------|------------------------|
| <i>Court</i> | <i>Discipline</i> | <i>Number of Times</i> |
| District Court of Clark County | Latent Print Examination | 24 |
| Nevada Grand Jury | Latent Print Examination | 12 |
| Nevada Justice Court | Latent Print Examination | 11 |
| Nevada Federal Court | Latent Print Examination | 8 |
| Alaska Superior Court | Latent Print Examination | 5 |
| Alaska Grand Jury | Latent Print Examination | 2 |
| EMPLOYMENT HISTORY | | |
| <i>Employer</i> | <i>Job Title</i> | <i>Date</i> |
| Self-employed | Forensic Instructor | 12/06 - present |
| LVMPD Forensic Laboratory | Forensic Lab Manager | 7/06 - present |
| LVMPD Forensic Laboratory | Latent Print Examiner II | 9/02 - 6/06 |
| Henderson Police Department | Crime Scene Analyst II | 8/01 - 7/02 |
| Henderson Police Department | Forensic Consultant | 5/01 - 8/01 |
| State of Alaska Crime Laboratory | Latent Print Examiner III | 4/97 - 4/01 |
| PROFESSIONAL AFFILIATIONS | | |
| <i>Organization</i> | <i>Date(s)</i> | |
| Expert Working Group on Human Factors in Latent Print Analysis | 2008 - present | |
| Journal of Forensic Identification Editorial Review Board | 2007 - present | |
| General Forensics Technology Working Group | 2007 - 2009 | |
| The Fingerprint Society, Fellow | 2002 - 2007 | |
| Scientific Working Group on Friction Ridge Analysis, Study and Technology (SWGFAST) | 2001 - present | |
| International Association for Identification (IAI), Distinguished Member 2004 | 1997 - present | |

PUBLICATIONS / PRESENTATIONS:**Publications:**

Maceo, Alice. "Qualitative Assessment of Skin Deformation: A Pilot Study", *Journal of Forensic Identification*, 59(4): 390-440.

Maceo, Alice. "Friction Ridge Skin - Morphogenesis and Overview" *Criminalistics Section of the Wiley Encyclopedia of Forensic Science*, John Wiley & Sons, Ltd. Editors-in-Chief Allan Jamieson and Andre Moenssens; Volume 3:1322-1331.

Maceo, Alice. "Documentation of Friction Ridge Impressions: From the Scene to the Conclusion" Chapter 11 of the Friction Ridge Source Book, *West Virginia University*, In press 2010.

Maceo, Alice. "Anatomy and Physiology of Adult Friction Ridge Skin" Chapter 2 of the Friction Ridge Source Book, *West Virginia University*, In press 2010.

Maceo, Alice. "Scars in Friction Ridge Skin", *Evidence Technology Magazine*, July 2005, p.26-28.

Maceo, Alice. "The Basis for The Uniqueness and Persistence of Scars in the Friction Ridge Skin", *Fingerprint Whorld*, 2005, 31(121):147-161.

Maceo, Alice. "The Biology of Skin", *Journal of Forensic Identification* 2003, 53(5):585-595.

Wertheim, Kasey and Maceo, Alice. "The Critical Stage of Friction Ridge and Pattern Formation", *Journal of Forensic Identification*, 2002, 52(1):23-73.

Maceo, Alice and Wertheim, Kasey. "Use of Ninhydrin in the Recovery of Latent Prints on Adhesive Surfaces Attached to Porous Surfaces", *Journal of Forensic Identification*, 2000, 50(6):581-594.

Presentations and Courses:

5/13 – 5/14/10 "Analysis of Distortion in Latent Prints", Michigan State Police, Detroit, MI

4/15 – 4/16/10 "Analysis of Distortion in Latent Prints", California Criminalistics Institute, Sacramento, CA

3/25/10 "Careers and Internships in Forensic Science" UNLV College of Sciences, Las Vegas, NV

3/23/10 "Admissibility of Latent Print Evidence", UNLV Law School, Las Vegas, NV

3/5 – 3/6/10 "Analysis of Distortion in Latent Prints", Colorado Bureau of Investigation, Denver, CO

12/10 – 12/11/09 "Analysis of Distortion in Latent Prints", Northern Colorado Regional Crime Laboratory, Ft. Collins, CO

10/15 – 10/16/09 "Analysis of Distortion in Latent Prints", Indiana IAI, Greenwood, IN

8/21/09 "Analysis of Distortion in Latent Prints", 94th IAI Educational Conference, Tampa, FL

PUBLICATIONS / PRESENTATIONS:

8/19/09 Panel Discussion: Potential Effects of Bias in Latent Print Examination

8/19/09 "Analysis of Distortion in Latent Prints", 94th IAI Educational Conference, Tampa, FL

8/18/09 "Analysis of Distortion in Latent Prints", 94th IAI Educational Conference, Tampa, FL

4/15 – 4/17/09 "Analysis of Distortion in Latent Prints" Los Angeles County Sheriff's Department, Los Angeles, CA

3/19 - 3/20/09 "Analysis of Distortion in Latent Prints" San Bernardino County Sheriff's Office, San Bernardino, CA

2/19 - 2/20/09 "Analysis of Distortion in Latent Prints" Oregon State Police, Clackamas, OR

2/9 – 2/10/09 "Analysis of Distortion in Latent Prints" LVMPD, Las Vegas, NV

1/22 – 1/23/09 "Analysis of Distortion in Latent Prints" California Criminalistics Institute, Sacramento, CA

8/22/08 "Analysis of Distortion in Latent Prints", 93rd IAI Educational Conference, Louisville, KY

8/21/08 "Analysis of Distortion in Latent Prints", 93rd IAI Educational Conference, Louisville, KY

8/19/08 "Analysis of Distortion in Latent Prints", 93rd IAI Educational Conference, Louisville, KY

6/26 – 6/27/08 "Analysis of Distortion in Latent Prints" Minnesota BCA, St. Paul, MN

6/13/08 "Introduction to Forensic Lab Services" Nevada DPS, Las Vegas, NV

5/29 – 5/30/08 "Analysis of Distortion in Latent Prints" FBI Laboratory, Quantico, VA

2/22/08 "Daubert and Pattern Evidence" - Panel Discussion, American Academy of Forensic Sciences, Washington DC

1/24 - 1/25/08 "Analysis of Distortion in Latent Prints" Ohio Bureau of Criminal Identification, London, OH

1/16/08 "Introduction to Latent Print Collection", LVMPD Laughlin Substation, NV

11/8/07 "Analysis of Distortion in Latent Prints", NEDIAI, Newport, RI

9/13/07 "Analysis of Distortion in Latent Prints", Maryland State Police, Pikesville, MD

8/9 - 8/10/07 "Analysis of Distortion in Latent Prints", Los Angeles County Sheriff's Department, San Dimas, CA

7/27/07 "Analysis of Distortion in Latent Prints", 92nd IAI Educational Conference, San Diego, CA

7/25/07 "Analysis of Distortion in Latent Prints", 92nd IAI Educational Conference, San Diego, CA

7/24/07 "Analysis of Distortion in Latent Prints", 92nd IAI Educational Conference, San Diego, CA

PUBLICATIONS / PRESENTATIONS:

7/23/07 "Moving Forward with Objectivity" - Panel Discussion, 92nd IAI Educational Conference, San Diego, CA

6/18/07 "Latent Print Evidence", LVMPD CSA Academy, Las Vegas, NV

6/6/07 "Introduction to Forensic Science: Latent Prints", Clark County District Attorney's Office, Las Vegas, NV

5/31 - 6/1/07 "Analysis of Distortion in Latent Prints", Contra Costa County Sheriff's Office, Martinez, CA

5/23/07 "Introduction to Latent Print Collection", LVMPD Laughlin Substation, NV

5/14 - 5/15/07 "Analysis of Distortion in Latent Prints", LVMPD, Las Vegas, NV

5/3 - 5/4/07 "Analysis of Distortion in Latent Prints", New York Department of Criminal Justice, Albany, NY

3/19 - 3/20/07 "Analysis of Distortion in Latent Prints", Arizona Identification Council, Mesa, AZ

12/18 - 12/19/06 "Analysis of Distortion in Latent Prints", Dutch National Police, Zoetermeer, Netherlands

12/15/06 "Forensic Science Series: Latent Prints", Clark County District Attorney's Office, Las Vegas, NV

11/10/06 "Error Rates in Non-Forensic Disciplines", ABFDE Daubert Symposium, Las Vegas, NV

10/9/06 "Error Rates: Method, Theory, and Practice", Indiana IAI Division 13th Annual Educational Conference of Forensic Investigation, Examination and Identification, Indianapolis, IN

10/9/06 "Aging and Wound Healing of the Friction Ridge Skin", Indiana IAI Division 13th Annual Educational Conference of Forensic Investigation, Examination and Identification, Indianapolis, IN

9/29/06 "Persistence of Scars in Friction Skin", SCAFO 15th Annual Forensic Training Seminar, Diamond Bar, CA

9/29/06 "Friction Ridge Skin Distortion", SCAFO 15th Annual Forensic Training Seminar, Diamond Bar, CA

8/24/06 "Biology of Friction Ridge Skin", NSDIAI Tri-State Educational Conference, Las Vegas, NV

7/7/06 "Analysis of Distortion in Latent Prints", IAI 91st Educational Conference, Boston, MA

7/5/06 "Error Rates: Method, Theory, and Practice", IAI 91st Educational Conference, Boston, MA

7/4/06 "Analysis of Distortion in Latent Prints", IAI 91st Educational Conference, Boston, MA

7/4/06 "Aging and Wound Healing in the Friction Ridge Skin", IAI 91st Educational Conference, Boston, MA

PUBLICATIONS / PRESENTATIONS:

7/3/06 "Analysis of Distortion in Latent Prints", IAI 91st Educational Conference, Boston, MA

5/17/06 "Analysis of Distortion in Fingerprints", International Symposium on Fingerprints, Interpol Headquarters, Lyon, France

12/16/05 "Biometrics: Gold Mine or Land Mine For Law Enforcement", Workshop on Ethical and Social Implications of Biometric Identification Technology: Towards an International Approach organized by the European Commission on Science and Society, Brussels, Belgium

10/21/05 "Biological Basis of Uniqueness and Persistence of the Friction Ridge Skin", Arizona Identification Council Conference, Maricopa, Arizona

10/5/05 "Analysis of Distortion in Latent Prints", Midwestern Association of Forensic Scientists, St. Louis, Missouri.

3/31/05 "Biological Basis of the Uniqueness, Persistence and Pattern Formation", Wisconsin IAI Educational Conference, Madison, WI

3/21/05 "Biological Basis of the Uniqueness, Persistence and Pattern Formation", Dutch National Police, Ridgeology Workshop, Zoetermeer, Netherlands

3/20/05 "Aging and Wound Healing of the Friction Ridge Skin", Fingerprint Society Lectures, Brighton, England

2/22/05 "Biological Basis of the Uniqueness, Persistence and Pattern Formation", Toronto Police Identification Conference, Toronto, Canada

1/13/05 "Introduction to Physical Evidence", Nevada Department of Wildlife, Las Vegas, Nevada

12/15/04, "A Friction Ridge Story", Phoenix Police Department, Phoenix, AZ

11/18/04, "The Impact of Check 21 on Latent Print Examinations", International Association of Financial Crimes Investigators, Las Vegas, NV

10/30/04, "A Friction Ridge Story", Daubert and the Comparative Sciences, Las Vegas, NV

9/21/04, "Crime Scene Chemicals", American Bio-Recovery Association, Las Vegas, NV

8/25/04, "A Friction Ridge Story", IAI 89th Educational Conference, St. Louis, Missouri

5/12/04, "A Friction Ridge Story", California State Division IAI Conference, Sacramento, California

4/8/04, "A Friction Ridge Story", Nevada State Division IAI Conference, Las Vegas, Nevada

3/9/04, "CSI: The 9 Part Series - Session 3: Latent Print Examinations", Clark County Bar Association, Las Vegas, Nevada

10/23/03, "Scientific Working Groups Update", Indiana Division IAI Training Conference

PUBLICATIONS / PRESENTATIONS:

10/21/03, "Pattern Formations in Nature and Fetal Ridge Formation", Indiana Division IAI Training Conference

7/8/03, "Patterns in Nature: Natural Selection vs. Physics", IAI 88th Educational Conference, Ottawa, Canada

3/9/03 "Biology of Friction Ridge Skin", 28th Annual Educational Conference of Fingerprint Society, Oxford, England

10/11/02 "Biology of Friction Ridge Skin", Southern California Association of Fingerprint Officers (SCAFO) Meeting, West Covina, CA

6/29/01 "Friction Ridge Skin and Pattern Formation During the Critical Stage: Fact and Theory", Centennial Conference on Identification - London, England

7/25/00 "Friction Ridge Skin and Pattern Formation During the Critical Stage: Fact and Theory", IAI 85th Educational Conference - Charleston, West Virginia

7/14/99 "Use of Ninhydrin in the Recovery of Latent Prints on Adhesive Surfaces Attached to Porous Surfaces", IAI 84th Educational Conference, Milwaukee, Wisconsin

OTHER QUALIFICATIONS:

Certified Latent Print Examiner by the International Association for Identification (IAI) 2001 to present

Certified Crime Scene Analyst by the International Association for Identification (IAI) 2000 - 2003

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 01/15/08

Name: Julie Marschner P#: 8806 Classification: Forensic Scientist II

Current Discipline of Assignment: Biology/DNA

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

| EDUCATION | | | |
|--|-------------------|---------------------|------------------|
| Institution | Dates Attended | Major | Degree Completed |
| Virginia Commonwealth University | 08/2003 - 12/2004 | Forensic Science | M.S. |
| CA Polytechnic State University, San Luis Obispo | 06/1997 - 06/2001 | Biological Sciences | B.S. |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|--------------------|---------------|
| Course / Seminar | Location | Dates |
| Internship: Virginia Department of Forensic Science - Forensic Biology and DNA Section | Richmond, VA | 6/04 to 08/04 |
| Orientation for Civilian Employees | Las Vegas, NV | 10/05 |
| Drivers Training II | Las Vegas, NV | 10/05 |
| 11 th National CODIS Conference | Arlington, VA | 11/05 |
| National Institute of Justice Expert Systems Testbed Project | Huntington, WV | 2/06 |
| American Academy of Forensic Sciences 58 th Annual Meeting | Seattle, WA | 2/06 |
| Serological Techniques and DNA Screening - Colleen Proffitt, MFS | Las Vegas, NV | 5/06 |
| Bode Advanced DNA Technical Workshop | Captiva Island, FL | 06/06 |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-----------------------|-------------------|
| Course / Seminar | Location | Dates |
| Bode Workshop - "Presenting Statistics in the Courtroom" | Captiva Island, FL | 06/06 |
| Differential Extraction | Las Vegas, NV | 06/06 |
| Complex Mixture Interpretation | Lakewood, CO | 08/06 |
| 17 th International Symposium on Human Identification | Nashville, TN | 10/06 |
| Advanced Topics in Statistics | Nashville, TN | 10/06 |
| CODIS 5.7.3 Software Training | McLean, VA | 11/06 |
| Forensic Population Genetics and Statistics | Las Vegas, NV | 11/27/06 |
| 13 th National CODIS Conference | Burlingame, CA | 10/07 |
| FBI DNA Auditor Training | Burlingame, CA | 10/07 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| Clark County District Court | Biology/DNA | 4 |
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| EMPLOYMENT HISTORY | | |
| Employer | Job Title | Date |
| Las Vegas Metropolitan Police Department Forensic Lab | Forensic Scientist | 07/2005 - Present |
| Perlegen Sciences, Mountain View, CA | Research Assistant II | 07/2001 - 08/2003 |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |
| American Academy of Forensic Sciences - Trainee Affiliate in Criminalistics | 02/07 - Present | |
| | | |

| PROFESSIONAL AFFILIATIONS | |
|-------------------------------|---------|
| Organization | Date(s) |
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| PUBLICATIONS / PRESENTATIONS: | |
| None | |
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| OTHER QUALIFICATIONS: | |
| None | |
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[FL 11/00]

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: Terry Martin

P# 5946

Date: 10-1-03

| CURRENT CLASSIFICATION | | | |
|-------------------------------|--------------------------------|---|-----------------------|
| | <i>Classification</i> | <i>Minimum Qualifications</i> | |
| | Crime Scene Analyst I | AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation. | |
| | Crime Scene Analyst II | 18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I. | |
| X | Senior Crime Scene Analyst | Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst. | |
| | Crime Scene Analyst Supervisor | Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field. | |
| FORMAL EDUCATION | | | |
| | <i>Institution</i> | <i>Major</i> | <i>Degree/Date</i> |
| | U of Texas-San Antonio | Criminal Justice | Bachelors Degree-1996 |
| | | | |
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| TESTIMONY | | | |
| Yes | No | | |
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| | | | |
| EMPLOYMENT HISTORY | | | |
| | <i>Employer</i> | <i>Title</i> | <i>Date</i> |
| | LVMPD | Sr. Crime Scene Analyst | 7-13-98 |

MARTIN, TERRY

P# 5946

CRIMINALISTICS BUREAU -

FIELD

DOH: 07-13-98

SENIOR CSA

SS#: 218-90-1956

| DATE | CLASS TITLE | AGENCY | CREDIT HOURS |
|----------------------|--|--|--------------|
| 8-96 | Criminal Justice | U of Texas- San Antonio | Degree |
| 07-28-98 | New Civilian Employee Orientation | LVMPD | 14 |
| 08-10-98 | CAPSTUN for Civilians | LVMPD | 1.5 |
| 08-10-98 | Stress Management | LVMPD | 4 |
| 08-12-98 | Civilian Use of Force & Firearms Training | LVMPD | 21 |
| 08-12-98 | Optional Weapon | LVMPD | |
| 08-13-98 | Combat Shooting Simulator - FATS | LVMPD | 1 |
| 07-13 to 08-14-98 | Crime Scene Analyst Academy - Criminalistics Bureau | LVMPD | 175 |
| 08-10-98 | Stress Management | LVMPD | 4 |
| 10-20-98 | Criminalistics Bureau - Field Training | LVMPD | 400 |
| 12-04-98 | Duty Weapon Qualification | LVMPD | 2 |
| 12-07-98 | Training - Motor Home Driving | LVMPD | 4 |
| 12-23-98 | Class II - Driver Training | LVMPD | 8 |
| 03-30-99 | Duty Weapon Qualification/Off-Duty Weapon Qualification | LVMPD | 2 |
| 04-16-99 | Duty Weapon Qualification/Off-Duty Weapon Qualification | LVMPD | 2 |
| 04-21-99 | Critical Procedures Test | LVMPD | 2 |
| 05-17-99 | Forensic Science Certificate | American Institute of Applied Science (AIAS) | 260 |
| 06-03-00 | Optional Weapon | LVMPD | 15 |
| 08-30 to 09-01-99 | Clandestine Laboratory Safety Certification Course, Occasional Site Worker | LVMPD | 24 |
| 09-08-99 | Combat Shooting Simulator/FATS | LVMPD | 1 |
| 09-13 to 09-17-99 | Crime Scene Technology 2 | Northwestern University, Traffic Institute | 40 |
| 09-21-99 | Duty Weapon Qualification | LVMPD | 2 |

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|----------------------|--|---|-----|
| 01-20-00 | Latent Fingerprint Development Workshop | U.S. Secret Service | 8 |
| 12-23-00 | Crime Scene Analyst Certification Certificate | IAI | |
| 09-20-01 | LVMPD Defensive Driving Course | LVMPD | 8 |
| 12-03 to 12-07-01 | Advanced Practical Homicide Investigation | P.H.I. Investigative Consultants, Inc. | 40 |
| 2-6-02 | Crime Scene Analyst (Level 2) | IAI | |
| 03-30-02 | Documentation of Footwear & Tire Impressions | LVMPD | 1 |
| 03-30-02 | Forensic Anthropology | LVMPD | 1.5 |
| 04-01-02 | Clandestine Laboratory Safety - Fingerprint Processing | LVMPD | 1 |
| 04-01-02 | Chemical Enhancements of Bloodstains, Preliminary Steps | LVMPD - Criminalistics Bureau | 1 |
| 04-01-02 | Major Case Prints | LVMPD | 3 |
| 02-03 to 02-05-03 | Shooting Incident Reconstruction - Forensic Identification Training Seminars | LVMPD | 24 |
| 02-06 to 02-08-03 | Advanced Shooting Incident Reconstruction - Forensic Identification Training Seminars | LVMPD | 24 |
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**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 02/23/11

Name: Crystal May P#: 9288 Classification: Forensic Lab Technologist

Current Discipline of Assignment: Biology/DNA

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

| EDUCATION | | | |
|---------------------------------|----------------|---------------------------------|------------------|
| Institution | Dates Attended | Major | Degree Completed |
| University of New Haven | 8/03-12/04 | Forensic Science-Criminalistics | M.S. |
| Saint-Mary-of-the-Woods College | 8/99-6/03 | Biology | B.S. |
| | | | |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|---------------|----------|
| Course / Seminar | Location | Dates |
| Forensic Biology Screening | Las Vegas, NV | 09/29/10 |
| Terminal Operator Certification | Las Vegas, NV | 09/24/10 |
| Plexor HY and Identifiler Plus | Las Vegas, NV | 09/09/10 |
| DNA Mixture and Interpretation & Statistics | Las Vegas, NV | 07/15/10 |
| Promega Plexor HY Overview | Las Vegas, NV | 07/13/10 |
| Evidence Evaluation and Collection for the Presence of DNA | Las Vegas, NV | 03/10/10 |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|----------------------------|-------------------|
| Course / Seminar | Location | Dates |
| AB HID University RT-PCR | Las Vegas, NV | 02/03/10 |
| AB HID University 240, Basic GMIDX | Las Vegas, NV | 07/28/10 |
| Urine Drug Screen Training Completion | Las Vegas, NV | 06/18/09 |
| Siemens Syva VIVA-E Analyzer | Las Vegas, NV | 06/16/09 |
| Blood Drug Screen Training Completion | Las Vegas, NV | 03/02/09 |
| Hair Evaluation for DNA Analysis | Las Vegas, NV (WVU online) | 02/09/09 |
| Orasure Forensic Toxicology Training 101 | Las Vegas, NV | 01/27/09 |
| Biological Fluid Identification | Sacramento, CA | 07/15/08-07/18/08 |
| AB CE Troubleshooting and GMID-X | Las Vegas, NV | 06/04/08 |
| AB7500 RT-PCR/Quant & Quant Duo Kit | Las Vegas, NV | 06/24/08 |
| Forensic Photography | Las Vegas, NV | 02/14/08 |
| Forensic Imaging Techniques | Las Vegas, NV | 01/08 |
| Applied Biosystems Training on 3130xl Genetic Analyzer | Las Vegas, NV | 11/01/07 |
| Introduction to Firearm Safety | Las Vegas, NV | 10/24/07 |
| Biological Terrorism | Las Vegas, NV (online) | 12/27/06 |
| National Incident Management System | Las Vegas, NV (online) | 12/27/06 |
| ABFDE Daubert Symposium 2006 | Las Vegas, NV | 11/06 |
| Heartsaver First Aid (American Heart Association) | Las Vegas, NV | 10/20/06 |
| Drivers Training II | Las Vegas, NV | 9/21/06 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |
| None | | |
| EMPLOYMENT HISTORY | | |

| <i>Employer</i> | <i>Job Title</i> | <i>Date</i> |
|--|----------------------------------|----------------|
| LVMPD Forensic Laboratory | Forensic Laboratory Technologist | 6/07-present |
| LVMPD Forensic Laboratory | Forensic Laboratory Technician | 7/06-6/07 |
| Denny's Pharmacy | Pharmacy Tech | 8/05-6/06 |
| Lucas County Coroner's Office | Toxicology Intern | 05/05-08/05 |
| University of New Haven | Chemistry Teaching Asst | 9/03-12/04 |
| Saint-Mary-of-the-Woods College | Chemistry Lab Asst | 10/99-6/03 |
| Argonne National Laboratory | Electrochemical Intern | 05/02-08/02 |
| PROFESSIONAL AFFILIATIONS | | |
| <i>Organization</i> | | <i>Date(s)</i> |
| None | | |
| PUBLICATIONS / PRESENTATIONS: | | |
| Electrochemistry Communications, "New Cathode Materials for Silver-based Primary Batteries: AgCuO ₂ and Ag ₂ Cu ₂ O ₃ " C.D. May, T.T. Vaughey 6 (2004) 1075-1079. | | |
| | | |
| OTHER QUALIFICATIONS: | | |
| None | | |

Curriculum Vitae
Las Vegas Criminalistics Bureau
Statement of Qualifications

Name: Ebony McGhee

P# 5158

Date: 10-1-03

| CURRENT CLASSIFICATION | | |
|------------------------|--------------------------------|---|
| | Classification | Minimum Qualifications |
| X | Crime Scene Analyst I | AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation. |
| | Crime Scene Analyst II | 18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I. |
| | Senior Crime Scene Analyst | Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst. |
| | Crime Scene Analyst Supervisor | Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field. |
| FORMAL EDUCATION | | |
| Institution | Major | Degree/Date |
| CCSN | Criminal Justice | Associates Degree-1998 |
| | | |
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| TESTIMONY | | |
| Yes | No | |
| | | |
| | | |
| EMPLOYMENT HISTORY | | |
| Employer | Title | Date |
| LVMPD | Crime Scene Analyst I | 5-29-96 |

McGHEE, EBONY
CSA I

P# 5158
SS#: 306-86-7688

CRIMINALISTICS BUREAU - FIELD
DOH: 05-29-96

| DATE | CLASS TITLE | AGENCY | CREDIT HOURS |
|-------------------|---|----------------------|--------------|
| 01-90 to 06-92 | Computer Information Systems | S.N.V.T.C. (Vo-Tech) | 5 Semesters |
| 10-07-96 | New Civilian Employee Orientation | LVMPD | 8 |
| 04-03-97 | Auto Theft | LVMPD | 2 |
| 05-27-97 | NCIC Certification - Limited Access | LVMPD | 7 |
| 01-01-98 | NCIC Recertification 2/Guide | LVMPD | 1 |
| 02-10-98 | Investigations: Internship | LVMPD | 9 |
| 08-21-98 | K-9 Perimeter Class | LVMPD | 3 |
| 08-92 to 05-98 | Criminal Justice - Degree - Associate of Applied Science (A.A.S.) - dated 05-14-98 - 83 Credits | C.C.S.N. | 1,245 |
| 01-00 to 05-00 | Photography 170 | C.C.S.N. | |
| 05-24-00 | Training Techniques | LVMPD | 8 |
| 03-21-01 | Patrol Response to Clandestine Drug Labs | LVMPD | 2 |
| 05-24-01 | Ecstasy & Other Drugs, The Pleasure Killers | LVMPD | 7.5 |
| 07-18-01 | Driver's Training II | LVMPD | 8 |
| 08-27-01 | NCIC/NCJIS Training 10132H-IIR | LVMPD | 1 |
| 08-06 to 08-31-01 | Crime Scene Analyst Academy - Criminalistics Bureau | LVMPD | 175 |
| 09-08 to 09-10-01 | Civilian Use of Force and Firearms Training - CCW permit granted | LVMPD | 21 |
| 10-01-01 | RC-Use of Force Video Training - Tape #1 | LVMPD | 15 Minutes |
| 12-01-01 | Field Training - Criminalistics Bureau | LVMPD | 400 |
| 04-02-02 | Chemical Enhancements of Bloodstains, Preliminary Steps | LVMPD | 2 |
| 04-03-02 | Documentation of Footwear & Tire Impressions | LVMPD | 1 |
| 04-03-02 | Major Case Prints | LVMPD | 3 |
| 04-04-02 | Criminal Law | LVMPD | 2 |

| DATE | CLASS TITLE | AGENCY | CREDIT HOURS |
|----------|-----------------------------|-------------------------------|--------------|
| 04-22-02 | Forensic Anthropology | LVMPD - Criminalistics Bureau | 1.5 |
| 05-22-02 | Handgun Refresher Training | LVMPD | 2 |
| 05-22-02 | Handgun Qualification 2 | LVMPD | 1 |
| 09-03-02 | Firearms Qualification 3 | LVMPD | 1 |
| 10-23-02 | Stress Management | LVMPD | 2 |
| 11-05-02 | Handgun Qualification 4 | LVMPD | 1 |
| 03-11-03 | Handgun Qualification 1 | LVMPD | 1 |
| 03-27-03 | Testifying in Court | LVMPD | 7 |
| 05-07-03 | Handgun Qualification 2 | LVMPD | 1 |
| 06-04-03 | Firearms Training Simulator | LVMPD | 1 |
| | | | |

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: Moretta McIntyre

P# 13207

Date: 03-25-08

| CURRENT CLASSIFICATION | | |
|-------------------------------|--------------------------------|---|
| | <i>Classification</i> | <i>Minimum Qualifications</i> |
| X | Crime Scene Analyst I | AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene |
| | Crime Scene Analyst II | 18 months - two (2) years continuous service with LVMPD as a Crime Scene Analyst I. |
| | Senior Crime Scene Analyst | Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst. |
| | Crime Scene Analyst Supervisor | Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field. |
| FORMAL EDUCATION | | |
| <i>Institution</i> | <i>Major</i> | <i>Degree/Date</i> |
| Grossmont College | Forensic Technology | Associate/May 2007 |
| | | |
| | | |
| | | |
| TESTIMONY | | |
| <i>Yes</i> | <i>No</i> | |
| | | |
| | | |
| EMPLOYMENT HISTORY | | |
| <i>Employer</i> | <i>Title</i> | <i>Date</i> |
| LVMPD | Crime Scene Analyst I | 03-10-08 to Present |
| Seirus Innovations | Accounting Clerk | 01/02 - 08/07 |
| Agri-Beef Company | Accounting Assistant | 10/99 - 12/01 |
| Kitsap P.U.D. | Accounting Intern | 12/98 - 07/99 |
| Todd McLean | Nanny | 06/96 - 12/98 |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/24/10

| | | | | | |
|-------|----------------|-----|------|-----------------|-----------------------|
| Name: | D. Angel Moses | P#: | 8002 | Classification: | Forensic Scientist II |
|-------|----------------|-----|------|-----------------|-----------------------|

| | |
|-----------------------------------|--------------------|
| Current Discipline of Assignment: | Firearms/Toolmarks |
|-----------------------------------|--------------------|

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)

| | | | |
|-----------------------|---|--------------------------------------|---|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | X | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | X |
| Latent Prints | | Crime Scene Investigations | X |
| Serology | | Clandestine Laboratory Response Team | |
| Document Examination | | DNA Analysis | |
| Quality Assurance | | Technical Support / | |

EDUCATION

| <i>Institution</i> | <i>Dates Attended</i> | <i>Major</i> | <i>Degree Completed</i> |
|------------------------|-----------------------|--------------|-------------------------|
| University of Illinois | 8/90 – 5/95 | Biophysics | B.S. |

ADDITIONAL TRAINING / SEMINARS

| <i>Course / Seminar</i> | <i>Location</i> | <i>Dates</i> |
|---|-----------------|--------------|
| Association of Firearm & Tool Mark Examiners (AFTE) – Annual Training Seminar | Las Vegas, NV | 05/10 |
| Shooting, Hunting, Outdoor, Trade Show (SHOT Show) | Las Vegas, NV | 01/10 |
| Association of Firearm & Tool Mark Examiners (AFTE) – Annual Training Seminar | Miami, FL | 05/09 |
| AFTE-FBI Gun Shot Residue Pattern Analysis Workshop | Miami, FL | 05/09 |
| AFTE-ATF Silencer Workshop | Miami, FL | 05/09 |
| AFTE-Taurus Factory Tour | Miami, FL | 05/09 |
| Consecutively Rifled Glock Miami Barrel Study (EBIS) | Las Vegas, NV | 04/09 |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-------------------|-------|
| Course / Seminar | Location | Dates |
| AHA - CPR/AED | Las Vegas, NV | 11/08 |
| Innov-X (EDX) Training | Las Vegas, NV | 08/08 |
| Slg Sauer Armorer Course | Las Vegas, NV | 07/08 |
| Small Arms Review Workshops | Las Vegas, NV | 08/07 |
| Innov-X (EDX) training | Las Vegas, NV | 08/07 |
| AFTE - Annual Training Seminar | San Francisco, CA | 05/07 |
| AFTE-Wound Ballistics Workshop | San Francisco, CA | 05/07 |
| Bunter mark validation study (T. Johnson) | Las Vegas, NV | 05/07 |
| Breechface & Firing Pin aperture validation study (KBI) | Las Vegas, NV | 05/07 |
| FBI Audit - NCIC Training Video | Las Vegas, NV | 01/07 |
| American Board of Forensic Document Examiners (ABFDE) - Daubert Symposium | Las Vegas, NV | 11/06 |
| ATF-Security Awareness Online Training | Las Vegas, NV | 11/06 |
| High Speed Video Training | Las Vegas, NV | 10/06 |
| Long Mountain Outfitters LLC-A K 47 Factory Certified | Henderson, NV | 10/06 |
| AFTE Annual Training Seminar | Springfield, MA | 06/06 |
| AFTE-Digital Imaging / Photomicrography Workshop | Springfield, MA | 06/06 |
| AFTE-Ruger GP100 Revolver Repair Course / Armory Workshop | Springfield, MA | 06/06 |
| AFTE-Analysis & Reconstruction of Long Range Shootings | Springfield, MA | 06/06 |
| Officer Involved Shootings, What to Expect | Las Vegas, NV | 04/06 |
| Colt Rifle Armorer Class | Las Vegas, NV | 08/05 |
| AFTE Annual Training Seminar | Indianapolis, IN | 06/05 |
| AFTE-Gradient Lens Workshop | Indianapolis, IN | 06/05 |
| Digital Imaging Class with David Witske, Foray Technologies | Las Vegas, NV | 02/05 |
| Shot Show | Las Vegas, NV | 01/05 |
| Forensic Shooting Scene Reconstruction Course | Paulden, AZ | 11/04 |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|---|-------|
| Course / Seminar | Location | Dates |
| AHA - CPR / FA | Las Vegas, NV | 10/04 |
| AFTE Annual Training Seminar | Vancouver, Canada | 05/04 |
| AFTE- Hi-Point Armorer Workshop | Vancouver, Canada | 05/04 |
| AFTE-1911 Armorer Workshop | Vancouver, Canada | 05/04 |
| NIBIN Users Group Meeting - ATF | Dublin, CA | 04/04 |
| PMC Factory Tour | Boulder City, NV | 03/04 |
| Bush Master Factory Tour | Lake Havasu City, AZ | 03/04 |
| Ruger Factory Tour | Prescott, AZ | 03/04 |
| Heckler & Koch, Inc. Armorer Class | Las Vegas, NV | 02/04 |
| Smith & Wesson Academy | Las Vegas, NV | 01/04 |
| Forensic Ballistics Workshop | Yuma, AZ | 12/03 |
| Drivers Training | Las Vegas, NV | 10/03 |
| LVMPD Civilian Orientation (Communication Skills) | Las Vegas, NV | 07/03 |
| LVMPD Civilian Orientation | Las Vegas, NV | 06/03 |
| CPR / AED | Nashville, TN | 09/02 |
| National Integrated Ballistic Information Network (NIBIN) training | Largo, FL | 09/02 |
| Serial Number Restoration (ATF) | Nashville, TN | 03/02 |
| Blood Spatter / Crime Scene | Nashville, TN | 11/00 |
| Association of Firearm & Toolmark Examiners / Annual Training Seminar | St. Louis, MO | 06/00 |
| Bunter Toolmark Manufacturing Tour | Greenbrier, TN | 04/00 |
| TN International Association for Investigation (TNIAI)-Gang Awareness | Nashville, TN | 11/99 |
| TNIAI-Saw Marks on Bones | Nashville, TN | 11/99 |
| Savage Arms, Inc. / Basic Armorer Course | Westfield, MA | 10/99 |
| New England Firearms Manufacturing Tour | Massachusetts, Connecticut, New Hampshire, New York | 10/99 |

| COURTROOM EXPERIENCE | | |
|---|---------------------|-----------------|
| Court | Discipline | Number of Times |
| Clark County District Court | Firearms & Toolmark | 53 |
| Nye County District Court | Firearms & Toolmark | 1 |
| U. S. Federal Court Las Vegas, NV | Firearms & Toolmark | 2 |
| Tennessee Circuit Courts Rutherford, Madison, Haywood County | Firearms & Toolmark | 3 |
| Tennessee Criminal Courts Scott, Bledsoe, Shelby County | Firearms & Toolmark | 7 |
| U.S. Federal Court/Memphis, TN | Firearms & Toolmark | 3 |

| EMPLOYMENT HISTORY | | |
|-----------------------------|---|---------------|
| Employer | Job Title | Date |
| LVMPD – Forensic Laboratory | Forensic Scientist II/Firearms Examiner | 05/03-Present |
| TN Bureau of Investigation | Forensic Scientist II | 08/00 – 03/03 |
| TN Bureau of Investigation | Forensic Scientist I | 08/98 – 08/00 |

| PROFESSIONAL AFFILIATIONS | |
|---|---------------|
| Organization | Date(s) |
| TN Division of International Association for Identification (TNIAl) | 11/98-12/02 |
| Association of Firearms & Toolmark Examiners (AFTE) | 01/00-Present |

| PUBLICATIONS / PRESENTATIONS: |
|--|
| University of Nevada, Las Vegas (UNLV) – Law Class (04/10) |
| UNLV – Forensic Class (03/10) |
| CSA Academy-Firearms Training (03/09) |
| UNLV-Forensic Class (02/09) |
| CSA Academy-Firearms Training (10/08) |
| Shadow Ridge High School-Forensic Class (05/08) |
| CSA Academy-Firearms Training (04/08) |
| UNLV-Forensic Class (10/07) |
| NIBIN Presentation to NLVPD (05/07) |

| PUBLICATIONS / PRESENTATIONS: |
|--|
| Western High School Forensic Presentation (03/07) |
| UNLV – Forensic Class (03/07) |
| Garnarelli Junior High Forensic Presentation (02/07) |
| CSA Academy-Firearms Training (12/06) |
| UNLV-Forensic Class (10/06) |
| OTHER QUALIFICATIONS: |
| None |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/25/10

Name: Kimberly B. Murga P#: 10140 Classification: Forensic Laboratory Manager

Current Discipline of Assignment: Biology/DNA

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

| EDUCATION | | | |
|----------------------------------|----------------|------------------|------------------|
| Institution | Dates Attended | Major | Degree Completed |
| George Washington University | 1995-1997 | Forensic Science | MFS |
| Chaminade University of Honolulu | 1990-1995 | Criminal Justice | BS |
| Chaminade University of Honolulu | 1990-1995 | Biology | BA |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|---------------|---------------------|
| Course / Seminar | Location | Dates |
| The NIJ Conference | Arlington, VA | June 14-16, 2010 |
| Applied Biosystems Real Time PCR, Theory, Quantification, Data Analysis and Troubleshooting Training (4 Hours) | Las Vegas, NV | February 3, 2010 |
| Northeast Regional Forensic Institute Leadership Assessment: Developing the Next Generation of Leaders | Albany, NY | January 14-15, 2010 |
| ASCLD/LAB International Preparation Course | Henderson, NV | December 1-3, 2009 |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-----------------|-----------------------|
| Course / Seminar | Location | Dates |
| Promega Technical Leaders Workshop | Las Vegas, NV | October 15, 2009 |
| Promega 20 th International Symposium on Human Identification | Las Vegas, NV | October 12-15, 2009 |
| QAS DNA Auditor Refresher Training | Las Vegas, NV | October 11-12, 2009 |
| Police Executive Research Forum Workshop: "DNA: Challenges and Opportunities" | Washington DC | September 23, 2009 |
| Nevada Statewide Mass Fatality Workshop | Las Vegas, NV | July 27-28, 2009 |
| Nevada Statewide Mass Fatality Conference | Las Vegas, NV | May 12, 2009 |
| Civilian Supervisory Development Program, Track II | Las Vegas, NV | September 22-26, 2008 |
| Leadership Skills For Challenging Times | Las Vegas, NV | August 11-14, 2008 |
| LVMPD Driver's Training Certification | Las Vegas, NV | July 15, 2008 |
| Domestic Violence and Sexual Assault Investigations | Reno, NV | May 15, 2008 |
| California Association of Criminalists 8-Hour DNA Workshop | San Diego, CA | May 6, 2008 |
| Applied Biosystems 3130XL Genetic Analyzer Training (6 hours) | Las Vegas, NV | November 2, 2007 |
| LVMPD Introduction to Firearm Safety | Las Vegas, NV | October 24, 2007 |
| National Forensic Science Technology Center Forensic Biology Screening Workshop | Las Vegas, NV | October 15-19, 2007 |
| Mid-Atlantic Association of Forensic Scientists | Washington DC | May, 2007 |
| Applied Biosystems 2-Day Workshop | Washington DC | May, 2006 |
| National Seminars Group, "The Creativity Day Camp for Managers, Supervisors and Team Leaders" | Rockville, MD | November 2005 |
| The National Association of Medical Examiners Meeting | Los Angeles, CA | October 2005 |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-------------------|----------------|
| Course / Seminar | Location | Dates |
| FBI DNA Auditor Training Program | Quantico, VA | September 2005 |
| The International Society for Optical Engineering, Defense and Security 2005: Homeland Security, Law Enforcement, and Battleship Technologies | Orlando, FL | March 2005 |
| Applied Biosystems Future Trends in Forensic DNA Technology | Bethesda, MD | September 2004 |
| Promega Annual Meeting | Phoenix, AZ | September 2003 |
| Promega Annual Meeting, "Basic Principles in Statistics" | Phoenix, AZ | September 2003 |
| American Academy of Forensic Sciences Annual Meeting | Chicago, IL | February 2003 |
| SkillPath Seminars, "The Essentials of Communicating with Diplomacy and Professionalism" | Silver Spring, MD | October 2002 |
| Midwestern Association of Forensic Scientists Annual Meeting | Milwaukee, WI | September 2002 |
| Midwestern Association of Forensic Scientists Annual Meeting, "Court Room Testimony" Workshop | Milwaukee, WI | September 2002 |
| George Carmody Statistics Course "Population Statistics and Forensic DNA Analysis" | Rockville, MD | July 2001 |
| American Academy of Forensic Sciences Annual Meeting | Seattle, WA | February 2001 |
| American Academy of Forensic Sciences Meeting, "The Testifying Expert" Workshop | Seattle, WA | February 2001 |
| Joint Task Force Full Accounting Meeting | Honolulu, HI | January 2000 |
| International Association of Forensic Scientists Meeting | Los Angeles, CA | August 1999 |
| International Association of Forensic Scientists Meeting, "Bombing Crime Scene and Evidence" Workshop | Los Angeles, CA | August 1999 |
| International Association of Forensic Scientists Meeting, "Human Bite Mark Investigation" Workshop | Los Angeles, CA | August 1999 |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|-------------------|-----------------|
| Course / Seminar | Location | Dates |
| American Academy of Forensic Sciences Annual Meeting | Orlando, FL | February 1999 |
| American Academy of Forensic Sciences Annual Meeting, "DNA Proficiency Testing" Workshop | Orlando, FL | February 1999 |
| Fred Pryor Systems, "How to Supervise People" | Bethesda, MD | May 1998 |
| Mid-Atlantic Association of Forensic Scientists Annual Meeting | Rockville, MD | May 1998 |
| American Academy of Forensic Sciences Annual Meeting | San Francisco, CA | February 1998 |
| American Academy of Forensic Sciences Annual Meeting, "Forensic Expert Witness Court Testimony" | San Francisco, CA | February 1998 |
| American Academy of Forensic Sciences Annual Meeting, "Recovery, Examination and Analysis of Decomposed and Skeletonized Remains" Workshop | San Francisco, CA | February 1998 |
| Armed Forces Institute of Pathology, "DNA Databanks and Repositories" | Chicago, IL | November 1997 |
| Armed Forces Institute of Pathology, "Basic Forensic Pathology" | Rockville, MD | October 1997 |
| American Academy of Forensic Sciences Annual Meeting | New York, NY | February 1997 |
| American Academy of Forensic Sciences Annual Meeting, "Deadly Paraphillias" Workshop | New York, NY | February 1997 |
| American Academy of Forensic Sciences Annual Meeting, "Multi disciplinary Symposium on the Use of Forensic Science" Workshop | New York, NY | February 1997 |
| Mid-Atlantic Association of Forensic Scientists, "Introduction to Criminalistics" | Gaithersburg, MD | October 1996 |
| Mid-Pacific Association of Forensic Scientists, "Forensics on the Cutting Edge 1995" | Honolulu, HI | March 1995 |
| COURTROOM EXPERIENCE | | |
| Court | Discipline | Number of Times |

| COURTROOM EXPERIENCE | | |
|---|---------------------|-----------------|
| Court | Discipline | Number of Times |
| United States Military Court System | DNA: Autosomal STRs | 2 |
| United States Military Court System | DNA: Y-STRs | 1 |
| 4 th Judicial District Court, Rusk County, Texas | DNA: Autosomal STRs | 2 |
| District Court, Nevada (VII District) | DNA: Autosomal STRs | 6 |

| EMPLOYMENT HISTORY | | |
|--|---|----------------|
| Employer | Job Title | Date |
| Las Vegas Metropolitan Police Department | Forensic Laboratory Manager | 2/08 - present |
| Las Vegas Metropolitan Police Department | Technical Leader, DNA | 7/07- 2/08 |
| Armed Forces DNA Identification Laboratory | Assistant Technical Leader, DNA | 9/05-7/07 |
| Armed Forces DNA Identification Laboratory | Supervisory DNA Analyst | 2/01-9/05 |
| Armed Forces DNA Identification Laboratory | DNA Analyst | 4/99-2/01 |
| Armed Forces DNA Identification Laboratory | Branch Chief, Proficiency Test Operations | 1/00-12/01 |
| Armed Forces DNA Identification Laboratory | Mitochondrial DNA Technician/Technologist | 11/97-4/99 |
| Armed Forces DNA Identification Laboratory | Quality Assurance Officer, Proficiency Test Operations Branch | 5/96-11/97 |

| PROFESSIONAL AFFILIATIONS | |
|---|--------------|
| Organization | Date(s) |
| American Academy of Forensic Sciences, Member, Criminalistics Section | 2003-Present |
| American Academy of Forensic Sciences, Student, Trainee, and Associate Member, Criminalistics Section | 1996-2003 |
| Mid-Atlantic Association of Forensic Scientists | 1999-2008 |

PUBLICATIONS / PRESENTATIONS:

The International Society for Optical Engineering, Defense and Security Symposium 2007: "Caught in the Iraqi War: How DNA was used to Confirm the Genetic Link between an Injured Four-Year Old Girl and her Family", Orlando, FL, April 2007

The International Society for Optical Engineering, Defense and Security Symposium 2007: "An Overview of the Armed Forces Medical Examiner System and its Use of Cutting Edge Technologies to Deal the with Global War on Terrorism", Orlando, FL, April 2007

Sexual Assault Response Team Training Program, "DNA and Its Application to Forensic Science", Rockville, MD, April 2006

The International Society for Optical Engineering, Defense and Security Symposium 2005: "The CSI Effect on Science: The Real Issues Regarding Human Identification and Forensic Science", Orlando, FL, April 2005

Sexual Assault Response Team Training Program, "DNA and Its Application to Forensic Science", Bethesda, MD, April 2005

C Torwalt, **K Murga**, J Epp, AT Balanchama, Y Daoudi, DA Lee, BC Smith. Cervical Smears as an Alternative Source of DNA in the Identification of Human Skeletal Remains. Canadian Society of Forensic Science 2005; 38 (3): 165-169

XXXV International Congress on Military Medicine: "Terror in the Skies After the World Trade Towers: The Identification and Reassociation of Remains from the Pentagon and Somerset Plane Crashes", Washington DC, September 2004

American Academy of Forensic Sciences: "A DNA Paternity Case Involving a Two-Week Old Fetus", Chicago, IL, February 2003.

American Academy of Forensic Sciences, "The Bombing of the USS Cole: The Role of DNA in Sending Seventeen Heroes Home", Chicago, IL, February 2003

American Academy of Forensic Sciences, "Terror in the Skies After the World Trade Towers: The Identification and Reassociation of Remains from the Pentagon and Somerset Plane Crashes", Chicago, IL, February 2003

The 8th National CODIS User's Conference, "Pentagon and Pennsylvania", Arlington, VA, November 2002

Midwestern Association of Forensic Scientists, "Terror in the Skies After the World Trade Towers: The Identification and Reassociation of Remains from the Pentagon and Somerset Plane Crashes", Milwaukee, WI, September 2002

Midwestern Association of Forensic Scientists, "Laboratory Information Systems Applications for Analysis of DNA Typing in the Workplace: New and Improved Methods for Enhancing Efficiency of Case Working Units", Milwaukee, WI, September 2002

PUBLICATIONS / PRESENTATIONS:

Chaminade University of Honolulu, "DNA Forensic Techniques and Case Studies", Honolulu, HI, November 2001

Sonoma State University, "When Bad Things Happen to Good People: The Use of DNA to Identify Remains", Sonoma, CA, February 2001

American Academy of Forensic Sciences Annual Meeting: "The Role of DNA Analysis in Mass Disasters", Seattle, WA, February 2001

Chaminade University of Honolulu, "Forensics and DNA", Honolulu, HI, January 2000

International Association of Forensic Sciences Meeting, "The Mount Baker Crash: Six World War II Soldiers Recovered and Identified After 52 Years Using mtDNA and Anthropological Methods", Los Angeles, CA, August 1999

Chaminade University of Honolulu, "Forensics and DNA", Honolulu, HI, March 1998

OTHER QUALIFICATIONS:

Commendable Action Certificate, Las Vegas Metropolitan Police Department, January 2008

Dedication to the Mission Award, Armed Forces DNA Identification Laboratory, September 2003

American Academy of Forensic Sciences Regional Award on behalf of the Midwestern Association of Forensic Scientists, February 2003

Outstanding Achievement Award, Armed Forces DNA Identification Laboratory, Armed Forces Institute of Pathology, 1999

Curriculum Vitae
AMY NEMCIK

CSA I, Criminalistics Bureau-Field P# 8504
SS #272-72-0987
DOH 10-18-04
DOB 12-31-75

EMPLOYMENT HISTORY

2004 – Present **LVMPD**
 CSA I

CURRENT CLASSIFICATION

Crime Scene Analyst I

AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation.

Crime Scene Analyst II

18 months-2 years continuous service with LVMPD as a Crime Scene Analyst I.

Senior Crime Scene Analyst

Two (2) years as a Crime Scene Analyst II to qualify for the promotion test for Senior Crime Scene Analyst.

Crime Scene Analyst Supervisor

Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, forensic Science, Physical Science or related field.

FORMAL EDUCATION

1998 **University of Utah**
 BS – Anthropology

TESTIMONY District Court, Justice Court, Grand Jury

CLASSROOM TRAINING

1998 Anthropology - Business Degree, University of Utah

10/19/2004 GroupWise 6.0 Calendar Functions, LVMPD. 7 credit hours

10/20/2004 NCIC – Phase II, LVMPD, 8 credit hours

AMY NEMCIK
Curriculum Vitae
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| | |
|-----------------------|--|
| 12/08/2004 | Child Abuse and Neglect, LVMPD, 2 credit hours |
| 12/16/2004 | Drivers Training, LVMPD, 8 credit hours |
| 11/1 to 11/30/2004 | Crime Scene analyst Academy, LVMPD, 160 credit hours |
| 12/06/2004 | Testifying in Court, LVMPD, 7 credit hours |
| 12/08/2004 | Child Abuse and Neglect, LVMPD, 2 credit hours |
| 12/07/2004 | WordPerfect 8 Basic, LVMPD, 7 credit hours |
| 12/29/2004 | CSA OC Spray/Defensive Tactics, LVMPD, 7 credit hours |
| 2/02 to 2/09/2005 | Orientation for Civilian Employees, LVMPD, 35 credit hours |
| 2/23 to 2/25/2005 | Clandestine Laboratory Safety Certification, LVMPD, 24 credit hours |
| 3/14 to 3/18/2005 | Crime Scene Technology 2: A Crime Scene Practicum Institute of Applied Forensic Technology, 40 credit hours |
| 3/22 to 3/24/2005 | Organized and Ritual Violence (Part 1), NSDIAI, 3 credit hours (3/22/2005) |
| 3/22 to 3/24/2005 | Nighttime Photographic Techniques, NSDIAI, 3 credit hours (3/23/2005) |
| 3/22 to 3/24/2005 | Homicide Issues: A Prosecutor's Perspective on Presenting Cases to a Jury, NSDIAI, 3 credit hours (3/23/2005) |
| 6/10/2005 | Firearms Qualification (For April, May, and June), LVMPD |
| 7/2005 | Digital Workstation Training (Sheree Norman, CSI Training Coordinator Assistant), LVMPD, 4 credit hours |
| 8/29/2005 | Forensic Science 101, American Institute of Applied Science, 230 credit hours |
| 8/30/2005 | Firearms Qualification (Quarterly), LVMPD, 2 credit hours |
| 10/26/2005 | FATS (Firearms Training Simulator), LVMPD, 1 credit hour |

AMY NEMCIK
Curriculum Vitae
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| | |
|-----------------------|---|
| 11/11/2005 | Completion of Proficiency Exercise – "Recording Major Case Prints", LVMPD, 2 credit hours |
| 2005 | Oct-Nov-Dec-Firearms Qualification, LVMPD, 1 credit hour |
| 12/7/2005 | Merging Digital Photography/Crime Scene Investigations, (Instructor: Mike Perkins), LVMPD, 4 credit hours |
| 2/1/2006 | Firearms Qualifications – 1 st Quarter, LVMPD, 1 credit hour |
| 1/16 to 1/20/2006 | Bloodstain Pattern Recognition – Instructor: Craig C. Moore, Niagara Regional Police Service (Canada), LVMPD, 40 credit hours |
| 3/13/ to 3/15/2006 | Practical Homicide Investigation, P.H.I. Investigative Consultants Inc., 24 credit hours |
| 3/16 to 3/17/2006 | Officer Involved Shootings & In-custody Deaths, LVMPD, 14 credit hours |
| 5/11/2006 | Bloodstain Pattern Recognition and Examination of Bloodstained Clothing Workshop, LVMPD, 8 credit hours |
| 6/20/2006 | Firearms Qualification – 2 nd Quarter, LVMPD, 1 credit hour |

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/25/10

Name: Carol J. Retamozo P#: 14280 Classification: Forensic Scientist I

Current Discipline of Assignment: Biology/DNA

| EXPERIENCE IN THE FOLLOWING DISCIPLINE(S) | | | |
|--|----------------|---------------------------------------|------------------|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | |
| Latent Prints | | Crime Scene Investigations | |
| Serology | X | Clandestine Laboratory Response Team | |
| Document Examination | | DNA Analysis | X |
| Footwear Impressions | | Technical Support / | |
| Quality Assurance | | | |
| EDUCATION | | | |
| Institution | Dates Attended | Major | Degree Completed |
| University of Central Florida | 01/08 – 08/08 | Forensic Science Minor: Chemistry | BS |
| University of Central Florida | 05/01 – 12/03 | Molecular Biology and Microbiology | BS |
| ADDITIONAL TRAINING / SEMINARS | | | |
| Course / Seminar | Location | Dates | |
| FDLE Crime Laboratory Analyst Training Program | Orlando, FL | Dec. 2008 to Feb. 2010 | |
| Applied Biosystems HID University Future Trends in Forensic DNA Technology Seminar Series | Orlando, FL | Oct. 2009 | |
| Advanced DNA Training | Huntington, WV | Dec. 2009 | |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|----------------|------------------------|
| Course / Seminar | Location | Dates |
| FDLE Biology/DNA Section Discipline Meeting | Largo, FL | May 2008 |
| Beckman Coulter Basic Biomek 3000 Customer Training | Orlando, FL | Jun. 2008 |
| Hair Examination for the DNA Analyst | Morgantown, WV | Aug. 2007 |
| Applied Biosystems 7500 Real Time PCR System: Quantifiler Kits and Standard Operator Training | Orlando, FL | Oct. 2006 |
| FDLE Screening Forensic Technologist Training Program | Orlando, FL | Oct. 2006 to Nov. 2006 |
| National Forensic Science Technology Center Pre-Screening Workshop | Largo, FL | May 2006 |
| FDLE Forensic Technologist Training Program | Orlando, FL | Dec. 2005 to Jun. 2006 |
| American Academy of Forensic Sciences Annual Meeting | Atlanta, GA | Feb. 2002 |

| COURTROOM EXPERIENCE | | |
|--|------------|-----------------|
| Court | Discipline | Number of Times |
| Florida Circuit Courts: 5 th Circuit, 7 th Circuit, 9 th Circuit (2), 18 th Circuit and 19 th Circuit | Serology | 6 |

| EMPLOYMENT HISTORY | | |
|--|---|---------------------|
| Employer | Job Title | Date |
| Las Vegas Metropolitan Police Department | Forensic Scientist I | 06/21/10 to Present |
| Florida Department of Law Enforcement | Crime Laboratory Analyst – Biology/DNA Section | 12/2008 to 05/2010 |
| Florida Department of Law Enforcement | Screening Forensic Technologist – Biology/DNA Section | 11/2006 to 12/2008 |
| Florida Department of Law Enforcement | Forensic Technologist – Biology, DNA Section | 12/2005 to 11/2006 |

| EMPLOYMENT HISTORY | | |
|---|-----------------------------|--------------------|
| Employer | Job Title | Date |
| Florida Department of Law Enforcement | Intern – Toxicology Section | 07/2004 to 12/2004 |
| PROFESSIONAL AFFILIATIONS | | |
| Organization | Date(s) | |
| American Academy of Forensic Sciences, Associate Member, Criminalistics Section | 2002 to Present | |
| PUBLICATIONS / PRESENTATIONS: | | |
| University of Central Florida, Introduction to Forensics Class, "Forensic Biology" (Serology), Orlando, FL March 2010 | | |
| Florida Department of Law Enforcement, Stetson University Forensics Class, "Forensic Biology," Orlando, FL April 2009 | | |
| OTHER QUALIFICATIONS: | | |
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**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY 06/17/09
STATEMENT OF QUALIFICATIONS**

Date: 06/24/10

Name: Eric S. Sahota P#: 9932 Classification: Forensic Scientist I

Current Discipline of Assignment: Latent Prints

| EXPERIENCE IN THE FOLLOWING DISCIPLINE(S) | | | |
|--|-----------------------|--------------------------------------|------------------|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | |
| Latent Prints | X | Crime Scene Investigations | X |
| Serology | | Clandestine Laboratory Response Team | |
| Document Examination | | DNA Analysis | |
| Quality Assurance | | Technical Support / | |
| EDUCATION | | | |
| Institution | Dates Attended | Major | Degree Completed |
| The Johns Hopkins University | 09/96 - 05/03 | Natural Sciences | BA |
| | | | |
| ADDITIONAL TRAINING / SEMINARS | | | |
| Course / Seminar | Location | Dates | |
| The Fingerprint Society Annual Conference 2010 | London, UK | 04/09/10-04/11/10 | |
| 62 nd Annual Scientific Meeting of the American Academy of Forensic Sciences | Seattle, WA | 02/22/10-02/26/10 | |
| IV th Mediterranean Academy of Forensic Sciences Meeting | Antalya-Bleck, Turkey | 10/14/09-10/18/09 | |
| Tri-Division IAI 4 th Annual Training Conference | Las Vegas, NV | 10/06/09-10/09/09 | |
| Southern California Assoc. of Fingerprint Officers 18 th Annual Training Conference | Burbank, CA | 10/02/09-10/03/09 | |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|-------------------------------------|------------------------|
| <i>Course / Seminar</i> | <i>Location</i> | <i>Dates</i> |
| Canadian Identification Society 32 nd Annual Training Conference | Vancouver, British Columbia, Canada | 09/22/09-09/24/09 |
| International Fingerprint Research Group 2009 | Lausanne, Switzerland | 06/29/09-07/03/09 |
| Forensic Science for the 21 st Century, ASU | Tempe, AZ | 04/03/09-04/04/09 |
| The Fingerprint Society Annual Conference 2009 | Manchester, UK | 03/20/09-03/22/09 |
| Analysis of Distortion in Latent Prints | Las Vegas, NV | 02/09/09-02/10/09 |
| GWS-L Latent User Methods and Operations | Las Vegas, NV | 09/17/08-09/18/08 |
| IAI 93 rd Educational Conference | Louisville, KY | 8/18 - 8/22/08 |
| Application of Statistics to Ridgeology And ACE-V Methodology | Las Vegas, NV | 03/31/08-04/04/08 |
| 24-Hour Application Study in Forensic Photography | Las Vegas, NV | 02/14/08 |
| Finding Latent Evidence with Chemistry & Light | Henderson, NV | 12/11/07-12/14/07 |
| Advanced Palm Print Comparison | Fresno, CA | 11/13/07-11/15/07 |
| IAI 2 nd Annual Tri-Division Conference | Salt Lake City, UT | 11/05/07-11/09/07 |
| SCAFO 16 th Annual Training Conference | Riverside, CA | 10/01/07-10/02/07 |
| IAI 92 nd Annual Educational Conference | San Diego, CA | 07/22/07-07/28/07 |
| Crime Scene Search, Documentation, & Recovery | Baltimore, MD | 05/08/06-05/26/07 |
| COURTROOM EXPERIENCE | | |
| <i>Court</i> | <i>Discipline</i> | <i>Number of Times</i> |
| Circuit Court for Baltimore City | Crime Scene | 3 |
| United States Court District of Nevada | Latent Prints | 1 |
| Clark County District Court | Latent Prints | 1 |
| Clark County Grand Jury | Latent Prints | 1 |
| EMPLOYMENT HISTORY | | |

| <i>Employer</i> | <i>Job Title</i> | <i>Date</i> |
|--|----------------------|----------------|
| Las Vegas Metropolitan Police Department | Forensic Scientist I | 03/07-Present |
| Baltimore Police Department | Crime Lab Technician | 09/05-03/07 |
| | | |
| PROFESSIONAL AFFILIATIONS | | |
| <i>Organization</i> | | <i>Date(s)</i> |
| International Association for Identification | | 2007-Present |
| Canadian Identification Society | | 2007-Present |
| Fingerprint Society (UK) | | 2007-Present |
| | | |
| PUBLICATIONS / PRESENTATIONS: | | |
| Presentations: | | |
| "Are Annotated Images a Solution for the Contemporaneous Documentation of Latent Print Examinations? MAFS IVth Annual Meeting, Belek, Turkey, October 2009. | | |
| "The NAS Report." Tri-Divisional IAI 4 th Annual Training Conference, Las Vegas, NV, October 2009. | | |
| "Establishing the Frequency of Close Non-Matching Prints in AFIS." International Fingerprint Research Group Meeting, Lausanne, Switzerland 2009. | | |
| "Validating Latent Print Methodology," Sahota and Haines, IAI 93 rd Annual Educational Conference, Louisville, KY 2008 | | |
| "Meeting the Challenges of the Daubert Trilogy: Refining and Redefining the Reliability of Forensic Evidence," Merlino et. Al, <i>Tulsa Law Review</i> . (43) 2 2007 | | |
| 11/07/07 "Back to the Beginning: The Biological Basis for Latent Print Examination", IAI 2 nd Tri-Division Conference Salt Lake City, UT | | |
| 11/07/2007 "Who Moved My Print? Damaged, Disguised, Forged Fingerprints", IAI 2 nd Tri-Division Conference Salt Lake City, UT | | |
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| OTHER QUALIFICATIONS: | | |
| Executive Board Member, Canadian Identification Society 09/2009-09/2010. | | |

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**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS**

Date: 06/24/10

Name: Jan Seaman Kelly P#: 5666 Classification: Forensic Scientist II

Current Discipline of Assignment: Questioned Documents

| EXPERIENCE IN THE FOLLOWING DISCIPLINE(S) | | | |
|---|----------------|--------------------------------------|------------------|
| Controlled Substances | | Blood Alcohol | |
| Toolmarks | | Breath Alcohol | |
| Trace Evidence | | Arson Analysis | |
| Toxicology | | Firearms | |
| Latent Prints | | Crime Scene Investigations | |
| Serology | | Clandestine Laboratory Response Team | |
| Document Examination | X | DNA Analysis | |
| Footwear Impressions | X | Technical Support / | |
| Quality Assurance | | | |
| EDUCATION | | | |
| Institution | Dates Attended | Major | Degree Completed |
| University of Central Oklahoma | 9/83 thru 5/85 | Criminal Justice | B.A. |
| South Oklahoma City Jr. College | 9/82 thru 5/83 | Registered Nursing | A.S. |
| Tulsa Jr. College | 9/75 thru 5/76 | Police Science | A.S. |
| | | | |
| ADDITIONAL TRAINING / SEMINARS | | | |
| Course / Seminar | Location | Dates | |
| Training on VSC-400 by Foster & Freeman | Las Vegas, NV | 05/22/09 | |
| Foster & Freeman – SICAR Training | Las Vegas, NV | 02/09/09 | |
| ST2AR Fall Workshop | Las Vegas, NV | 10/20-10/24/08 | |
| Forensic Photography | Las Vegas, NV | 02/14/08 | |
| Forensic Imaging Techniques | Las Vegas, NV | 01/08 | |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|---------------|-------------------|
| Course / Seminar | Location | Dates |
| Leadership Skills for Challenging Times | Las Vegas, NV | 07/16/07-07/19/07 |
| Apprenticeship – Footwear Impression Evidence | Las Vegas, NV | 02/06 thru 02/07 |
| ABFDE Recertification | Las Vegas, NV | 11/06 |
| ABFDE Workshops | Las Vegas, NV | 11/05 |
| Mistake-Free Grammar and Proof Reading | Las Vegas, NV | 06/05 |
| Mideo Systems by Gary Crawford | Las Vegas, NV | 06/05 |
| Footwear Impression Examination Course - FBI | Quantico, VA | 04/05 |
| Examination and Comparison of Footwear Impressions - Nevada State Division of the International Association for Identification | Las Vegas, NV | 03/05 |
| Collection and Preservation of Footwear Impressions - Nevada State Division of the International Association for Identification | Las Vegas, NV | 03/05 |
| Initial Training on Mideo | Las Vegas, NV | 01/05 |
| ABFDE Daubert Seminar | Las Vegas, NV | 10/04 |
| ABFDE Workshop | Las Vegas, NV | 10/04 |
| Check 21 by Wells Fargo Bank | Las Vegas, NV | 09/04 |
| Train the Raters | Las Vegas, NV | 09/04 |
| Cultural Awareness | Las Vegas, NV | 09/04 |
| Swimming Thru the Sea of Payroll Forms | Las Vegas, NV | 08/04 |
| Requisition Processing | Las Vegas, NV | 08/04 |
| Problem Solving, Independent Decision Making Alt | Las Vegas, NV | 08/04 |
| Developing Your Employees Potential Alt | Las Vegas, NV | 05/04 |
| Acting Supervisor Class | Las Vegas, NV | 3/04 |
| Stress Management | Las Vegas, NV | 03/04 |
| Employment Diversity, Harassment, Discrimination - EEOC | Las Vegas, NV | 02/04 |

| ADDITIONAL TRAINING / SEMINARS | | |
|--|-------------------|-------|
| Course / Seminar | Location | Dates |
| Creating a Positive Work Environment | Las Vegas, NV | 02/04 |
| QD Section Meeting - AAFS | Dallas, TX | 02/04 |
| Adobe Photoshop for Document Examiners - AAFS Meeting | Dallas, TX | 02/04 |
| Highly Effective Meetings | Las Vegas, NV | 01/04 |
| The Detection, Recovery and Examination of Footwear Impression Evidence - William Bodziak | Jacksonville, FL | 11/03 |
| American Society of Questioned Document Examiners (ASQDE) Meeting | San Diego, Ca | 08/02 |
| International Association for Identification - 87 th International Educational Conference | Las Vegas, NV | 08/02 |
| Digital Imaging Workshop | Las Vegas, NV | 10/01 |
| Digital Imaging Workshop | Las Vegas, NV | 09/01 |
| American Society of Questioned Document Examiners (ASQDE) | Ottawa, Canada | 08/00 |
| American Academy of Forensic Sciences | Reno, NV | 02/00 |
| Canon Workshop (ABFDE sponsored) | Atlanta, GA | 10/99 |
| National Forensic Science Technology Center Laboratory Auditing Course | Las Vegas, NV | 06/99 |
| SWAFDE Workshop | Las Vegas, NV | 04/99 |
| ASQDE meeting | Indianapolis, IN | 08/98 |
| ABFDE Workshop | Las Vegas, NV | 06/98 |
| Graffiti Investigations & Vandalism | Las Vegas, NV | 04/98 |
| AAFS meeting | San Francisco, CA | 02/98 |
| Computer Seizure (CAT/NWAFS/SWAFS/SAT) | Las Vegas, NV | 11/97 |
| ASQDE meeting | Washington, DC | 08/96 |
| AAFS meeting (Digital Imaging and Infra-red Workshops) | Nashville, TN | 02/96 |

| ADDITIONAL TRAINING / SEMINARS | | |
|---|------------------|------------------|
| Course / Seminar | Location | Dates |
| SWAFDE meeting | San Diego, CA | 04/95 |
| AAFS meeting | Seattle, WA | 02/95 |
| AAFS meeting (Typewriter and Paper Fracture Workshops) | San Antonio, TX | 02/94 |
| SWAFDE meeting | Albuquerque, NM | 10/93 |
| AAFS meeting | Boston, MA | 02/93 |
| SWAFDE meeting (Mead Paper Workshop) | Denver, CO | 10/92 |
| SWAFDE meeting | San Diego, CA | 04/92 |
| SWAFDE meeting | Phoenix, AZ | 10/91 |
| ASQDE meeting | Orlando, FL | 08/91 |
| AAFS meeting | Anaheim, CA | 02/91 |
| SWAFDE meeting | Long Beach, CA | 10/90 |
| SWAFDE meeting | Park City, UT | 04/90 |
| American Academy of Forensic Sciences (AAFS) | Cincinnati, OH | 02/90 |
| SWAFDE meeting | Oakland, CA | 10/89 |
| SWAFDE meeting | Tucson, AZ | 04/89 |
| SWAFDE meeting | Aurora, CO | 09/88 |
| Apprenticeship with U.S. Postal Service Crime Laboratory - two year | San Bruno, CA | 01/87 thru 01/89 |
| SWAFDE meeting | Palm Springs, CA | 10/87 |
| FBI Questioned Document School | Quantico, VA | 08/87 |
| Southwest Association of Forensic Document Examiners (SWAFDE) meeting | Sante Fe, NM | 05/87 |
| Arizona DPS Document Laboratory | AZ | 07/86 |
| Questioned Document Course: Secret Service | Glynco, GA | 03/86 |
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