

**2019 APAAC Annual Prosecutor Conference**  
**June 19-21, 2019**  
**Arizona Grand Resort & Spa**  
**Phoenix, Arizona**



**The 21st Century Trial**

Presented By:

**Jason Kalish**

Deputy Maricopa County Attorney  
&

**Jonathan Mosher**

Deputy Pima County Attorney

Distributed by:

Arizona Prosecuting Attorneys' Advisory Council  
1951 West Camelback Road, Suite 202  
Phoenix, Arizona

ELIZABETH BURTON ORTIZ  
EXECUTIVE DIRECTOR



# **The 21<sup>st</sup> Century Trial**

**Jason Kalish**

**Jonathan Mosher**

# The Past



# The Present



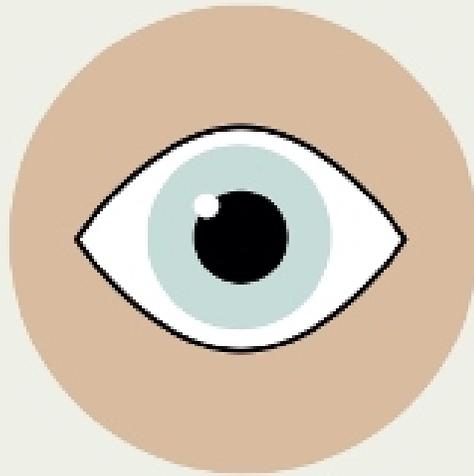
# So Why Is Anyone Still Doing This?



# What Must the Jury Do?

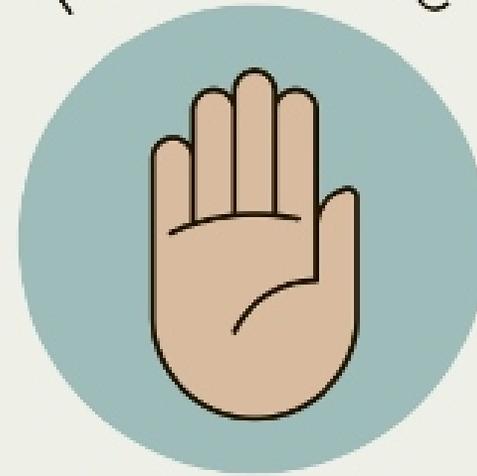


VISUAL



AUDITORY

KINESTHETIC



# Has Learning Changed?



# Who decides your trial



# Who decides your trial



# Who decides your trial



## Consider The Learning Process

- One witness at a time
- No narration or commentary
- Don't control what they see/when/how long
- Note pads, pens?
- Can't talk to each other!
- Unseen forces (law, rules of evidence)



# One Witness At A Time



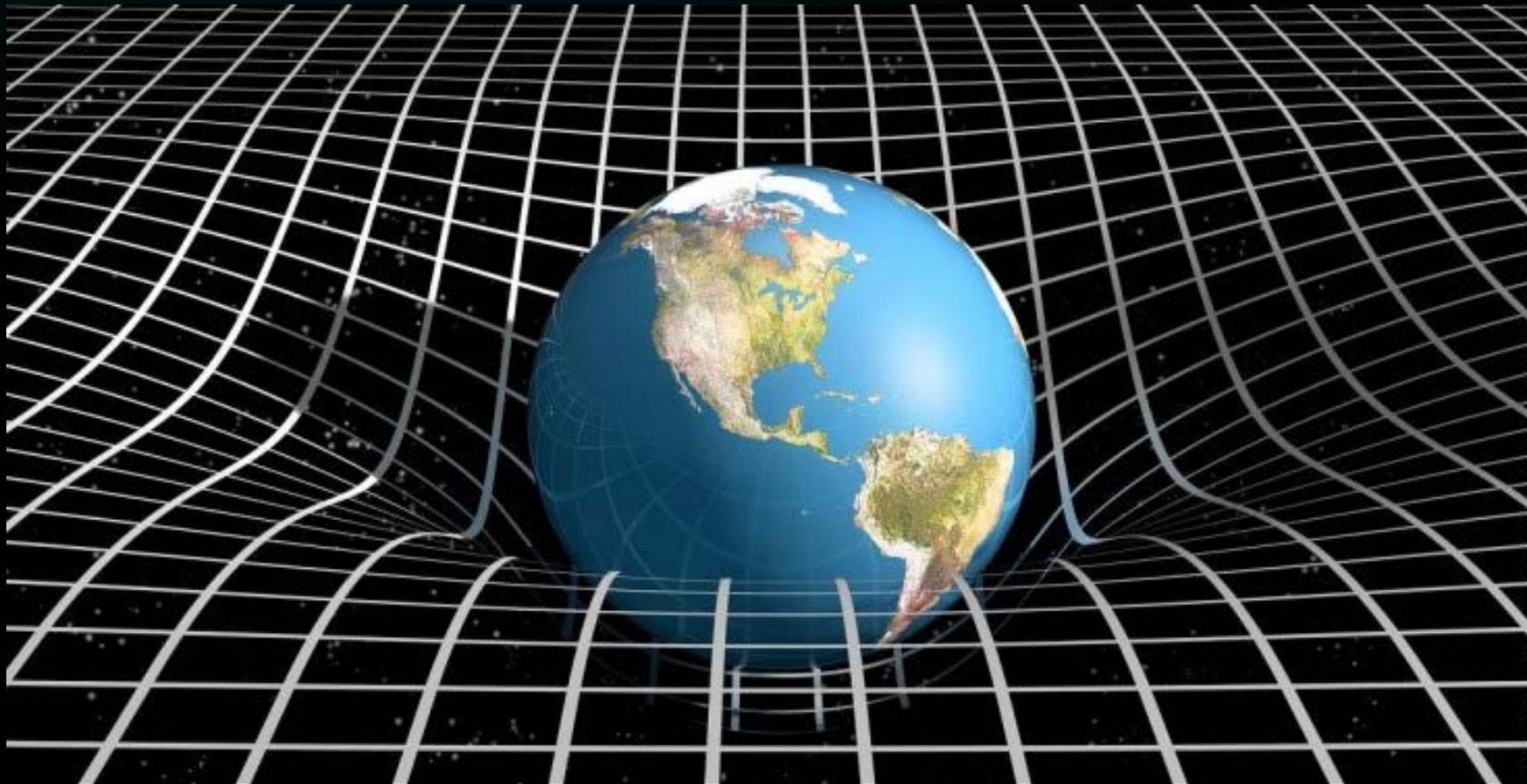
# No Explanation



# No Control



# Unseen Forces



### ABSTRACT

A method is presented for the rapid isolation of high molecular weight plant DNA (50,000 base pairs or more in length) which is free of contaminants which interfere with complete digestion by restriction endonucleases. The procedure yields total cellular DNA (i.e. nuclear, chloroplast, and mitochondrial DNA). The technique is ideal for the rapid isolation of small amounts of DNA from many different species and is also useful for large scale isolations.

### INTRODUCTION

With the increasing use of recombinant DNA techniques in plant research the preparation of long, pure DNA has become a major concern. Since the same forces which are required to break cell walls can also shear DNA, considerable care must be taken and one must often reach a compromise between DNA yields and length. While intact nuclei are a good starting source for long plant DNA, the nuclei may be difficult to isolate in quantity and the techniques required are often quite involved. Polysaccharides and tannins pose a major problem in plants because they are difficult to separate from DNA. Polysaccharide-like contaminants which are undetectable by most criteria can cause anomalous reassociation kinetics (1,2). Many of the initial problems encountered in the cloning of plant DNA have been attributed to contaminants which interfere with restriction nucleases as well as to DNA of insufficient length (numerous personal communications). With the following procedure restriction analysis of the DNA can proceed on the day following the start of DNA isolation. Electrophoretic analysis after restriction shows very sharp bands even for high molecular weight fragments.

### MATERIALS AND METHODS

Cetyltrimethylammonium bromide (CTAB)<sup>(1)</sup> was purchased from Sigma (cat. # H-5882), CsCl from Kawecki Berylco Industries, and restriction

# What is DNA?

April 8, 2014

by Zoë Gamble

DNA stands for **deoxyribonucleic acid**. It's the genetic code that determines all the characteristics of a living thing. Basically, your DNA is what makes you, you!

You got your DNA from your parents, we call it 'hereditary material' (information that is passed on to the next generation). Nobody else in the world will have DNA the same as you, unless you have an identical twin.

Deoxyribonucleic acid is a large molecule in the shape of a double helix. That's a bit like a ladder that's been twisted many times.



The structure of DNA – a double helix. Image: Caroline Davis2010 (CC-BY)

*It's made up of repeating units called nucleotides. Each nucleotide contains a sugar and a phosphate molecule, which make up the 'backbone' of DNA, and, one of four organic bases. The bases are adenine (A), guanine (G), cytosine (C) and thymine (T). It's the specific order of A, G, C and T within a DNA molecule that is unique to you, and gives you your characteristics.*

# Who decides your trial





# Orient Your Learners



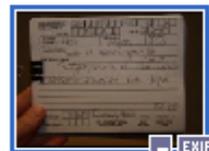
# Where You Are Matters



"As you can see here,  
your Honor..."

# Where You Are Matters





--p0001

JPEG TrueColor (v1.1)  
3888x2592x24



--p0002

JPEG TrueColor (v1.1)  
2592x3888x24



--p0003

JPEG TrueColor (v1.1)  
2592x3888x24



--p0004

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2592x3888x24



--p0005

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--p0006

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--p0010

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3888x2592x24



--p0011

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--p0013

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--p0018

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--p0019

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--p0020

JPEG TrueColor (v1.1)  
2592x3888x24



--p0021

JPEG TrueColor (v1.1)



--p0022

JPEG TrueColor (v1.1)



--p0023

JPEG TrueColor (v1.1)



--p0024

JPEG TrueColor (v1.1)



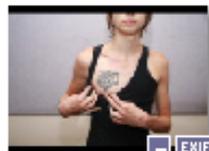
--p0025

JPEG TrueColor (v1.1)



--p0026

JPEG TrueColor (v1.1)



--p0027

JPEG TrueColor (v1.1)



--p0028

JPEG TrueColor (v1.1)



--p0029

JPEG TrueColor (v1.1)



--p0030

JPEG TrueColor (v1.1)



x n v i e w

Window Info

Icons: Save, Print, Copy, Paste, Undo, Redo, Refresh, Home, Back, Forward, Stop, Reload, Home, Back, Forward, Stop, Reload

Grid of image thumbnails:

- p0001: JPEG TrueColor (v1.1), 3888x2592x24
- p0002: JPEG TrueColor (v1.1), 2592x3888x24
- p0011: JPEG TrueColor (v1.1), 3888x2592x24
- p0012: JPEG TrueColor (v1.1), 2592x3888x24 (Selected)
- p0021: JPEG TrueColor (v1.1), 3888x2592x24
- p0022: JPEG TrueColor (v1.1), 2592x3888x24

Preview Properties Histogram

Batch Rename... (highlighted with red arrow)

8 MB | --p0012.jpg | 2592x3888x24 (0.67)

Context Menu:

- Open
- View in Fullscreen F11
- Open With
- Open All Selected
- Cut Ctrl+X
- Copy Ctrl+C
- Copy image data Ctrl+Shift+C
- Paste Ctrl+V
- Copy to folder... Alt+C
- Move to folder... Alt+M
- Delete... Del
- Rename... F2
- New Folder F7
- Print... Ctrl+P
- Send by Email...
- Describe... Ctrl+D
- Edit IPTC data... Ctrl+I
- Open GPS location in Google Maps
- Tag
- Rating & Colour label
- Set as Wallpaper
- Slide Show... Ctrl+L
- Batch Processing... Ctrl+U
- Batch Rename... (highlighted)
- Compare... Shift+C
- JPEG Lossless transformations
- Rebuild thumbnails
- Properties Alt+Enter



Batch Rename

Name template

Exhibit#

Start: 1

Step: 1

Create new Name template when opening dialog

Extension

jpg

Case

Name & Extension: Lowercase

Replace

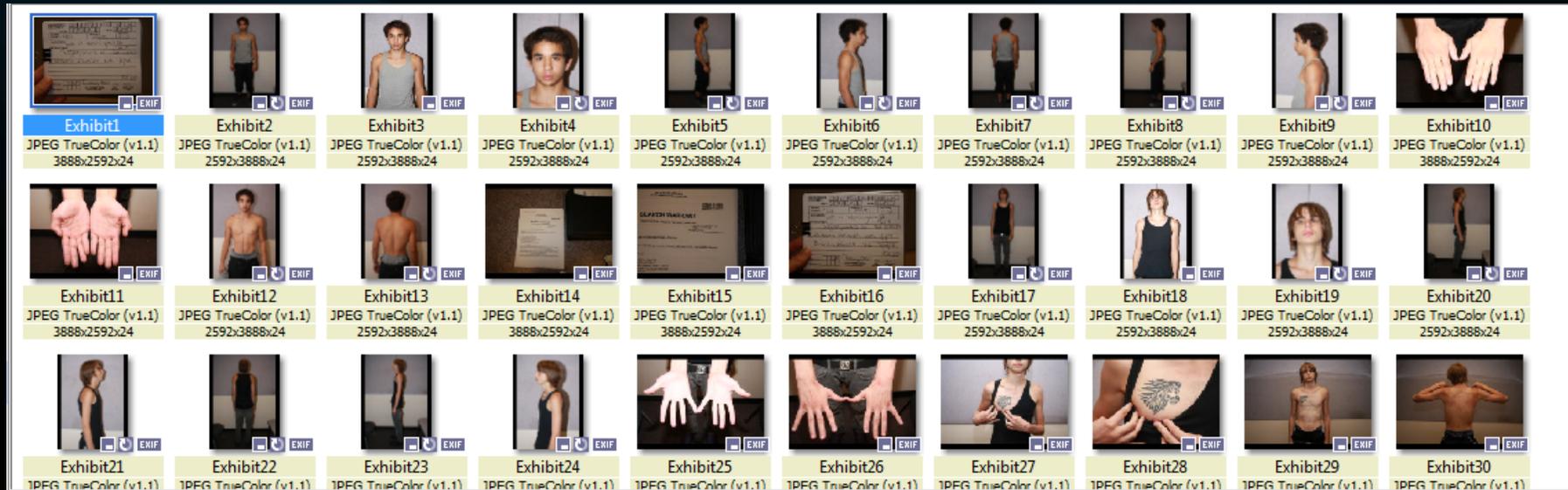
With  Case sensitive

Sort by Name

Double-Click on a file creates a new Name template

Old Name	New Name
-p0001.jpg	Exhibit 1.jpg
-p0002.jpg	Exhibit 2.jpg
-p0003.jpg	Exhibit 3.jpg
-p0004.jpg	Exhibit 4.jpg
-p0005.jpg	Exhibit 5.jpg
-p0006.jpg	Exhibit 6.jpg
-p0007.jpg	Exhibit 7.jpg
-p0008.jpg	Exhibit 8.jpg





State v. Roberts CR 2012-006709 - Trial Exhibits



Exhibit1



Exhibit2



Exhibit3



Exhibit4



Exhibit5



Exhibit6



Exhibit7



Exhibit8



Exhibit9



Exhibit10



Exhibit11



Exhibit12



What to Watch

BEST OF YOUTUBE

- Popular on YouTube
- Music
- Sports
- Gaming
- Education
- Movies
- TV Shows
- News
- Live
- Spotlight

Browse channels

Sign in now to see your channels and recommendations!

Sign in

Filters

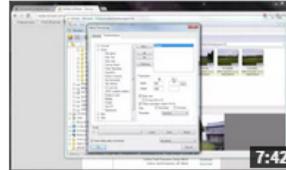
About 144 results



XnView Clip: How to Use Batch Rename

by DeathB.E.A.T. 3 weeks ago • 2 views

While there are numerous batch-renaming utilities out there, I wanted to show how it is done in XnView, which is referenced in the ...



Batch Process Photos with XnView

by michaelbuddy 2 years ago • 1,012 views

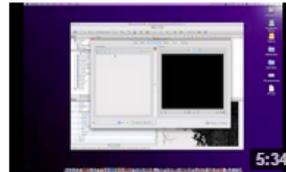
XnView is a great utility / image editor for your computer. It does so much and is super light weight. Here I demonstrate a batch



How to batch rename files in OS X Yosemite

by myjailbreakmovies 5 months ago • 16,316 views

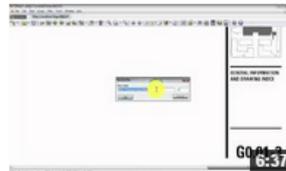
Retweet: http://ct.ec/W\_F7L Description: Batch renaming allows you to use the Finder to rename multiple files at once. Follow ...



Quick Tips 1: Batch Process Images

by Dramatic Purposes 1 year ago • 57 views

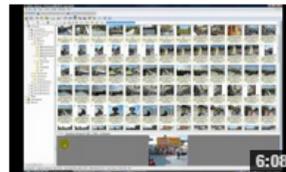
In our very first quick tip, get introduced to a time-saving way to perform edits on multiple photos at once. Learn how to use ...



Rename Pages For On Screen Takeoff OST w/ XnView

by Jason Cherene 5 months ago • 39 views

Rename Pages For On Screen Takeoff OST w/ XnView. Renaming pages in OST doesnt rename the actual file so here is a work ...



Saving Savvy With Dr. Mike: XNVIEW batch photo resize.

by Mike Kuna 5 years ago • 1,459 views

Today's cameras take great pictures but they produce huge photo files which are difficult to use for email, web pages and on-line ...

## Legal Issues

- Zooming
- Has any judge prohibited zooming on an Elmo?
- Are reading glasses OK?
- Then why can't you zoom on digital files?
- Admit the jpegs and this is a non-issue

For Sanction	PLF_STATE_24.JPG	PLF_STATE_48.JPG	PLF_STATE_72.JPG
PLF_STATE_1.JPG	PLF_STATE_25.JPG	PLF_STATE_49.JPG	PLF_STATE_73.JPG
PLF_STATE_2.JPG	PLF_STATE_26.JPG	PLF_STATE_50.JPG	PLF_STATE_74.JPG
PLF_STATE_3.JPG	PLF_STATE_27.JPG	PLF_STATE_51.JPG	PLF_STATE_75.JPG
PLF_STATE_4.JPG	PLF_STATE_28.JPG	PLF_STATE_52.JPG	PLF_STATE_76.jpg
PLF_STATE_5.JPG	PLF_STATE_29.JPG	PLF_STATE_53.JPG	PLF_STATE_77.jpg
PLF_STATE_6.JPG	PLF_STATE_30.JPG	PLF_STATE_54.JPG	PLF_STATE_78.jpg
PLF_STATE_7.JPG	PLF_STATE_31.JPG	PLF_STATE_55.JPG	PLF_STATE_79.jpg
PLF_STATE_8.JPG	PLF_STATE_32.JPG	PLF_STATE_56.JPG	PLF_STATE_80.jpg
PLF_STATE_9.JPG	PLF_STATE_33.JPG	PLF_STATE_57.JPG	PLF_STATE_81.jpg
PLF_STATE_10.JPG	PLF_STATE_34.JPG	PLF_STATE_58.jpg	PLF_STATE_82.jpg
PLF_STATE_11.JPG	PLF_STATE_35.JPG	PLF_STATE_59.jpg	PLF_STATE_83.png
PLF_STATE_12.JPG	PLF_STATE_36.JPG	PLF_STATE_60.jpg	PLF_STATE_84.JPG
PLF_STATE_13.JPG	PLF_STATE_37.JPG	PLF_STATE_61.jpg	PLF_STATE_85.JPG
PLF_STATE_14.JPG	PLF_STATE_38.JPG	PLF_STATE_62.jpg	PLF_STATE_86.JPG
PLF_STATE_15.JPG	PLF_STATE_39.JPG	PLF_STATE_63.jpg	PLF_STATE_87.JPG
PLF_STATE_16.JPG	PLF_STATE_40.JPG	PLF_STATE_64.jpg	PLF_STATE_88.mp4
PLF_STATE_17.JPG	PLF_STATE_41.JPG	PLF_STATE_65.jpg	
PLF_STATE_18.JPG	PLF_STATE_42.JPG	PLF_STATE_66.jpg	
PLF_STATE_19.JPG	PLF_STATE_43.JPG	PLF_STATE_67.jpg	
PLF_STATE_20.JPG	PLF_STATE_44.JPG	PLF_STATE_68.jpg	
PLF_STATE_21.JPG	PLF_STATE_45.JPG	PLF_STATE_69.jpg	
PLF_STATE_22.JPG	PLF_STATE_46.JPG	PLF_STATE_70.JPG	
PLF_STATE_23.JPG	PLF_STATE_47.JPG	PLF_STATE_71.JPG	

 1.JPG	 25.JPG	 49.JPG
 2.JPG	 26.JPG	 50.JPG
 3.JPG	 27.JPG	 51.JPG
 4.JPG	 28.JPG	 52.JPG
 5.JPG	 29.JPG	 53.JPG
 6.JPG	 30.JPG	 54.JPG
 7.JPG	 31.JPG	 55.JPG
 8.JPG	 32.JPG	 56.JPG
 9.JPG	 33.JPG	 57.JPG
 10.JPG	 34.JPG	 58.jpg
 11.JPG	 35.JPG	 59.jpg
 12.JPG	 36.JPG	 60.jpg
 13.JPG	 37.JPG	 61.jpg
 14.JPG	 38.JPG	 62.jpg
 15.JPG	 39.JPG	 63.jpg
 16.JPG	 40.JPG	 64.jpg
 17.JPG	 41.JPG	 65.jpg
 18.JPG	 42.JPG	 66.jpg
 19.JPG	 43.JPG	 67.jpg
 20.JPG	 44.JPG	 68.jpg
 21.JPG	 45.JPG	 69.jpg
 22.JPG	 46.JPG	 70.JPG
 23.JPG	 47.JPG	 71.JPG
 24.JPG	 48.JPG	 72.JPG



Exhibit  
32



Exhibit  
33



Exhibit  
34

15502

NO SOLICITING 

Exhibit  
35

## Legal Issues

- BUT...
- Should be allowed to do visually what you can do verbally
- Are laser pointers misconduct?
- So why would arrows be improper?

# Visuals Anticipate Defenses

- Jury nullification

# Visuals Anticipate Defenses

- Make your non-visual visuals visual

# Visuals Anticipate Defenses

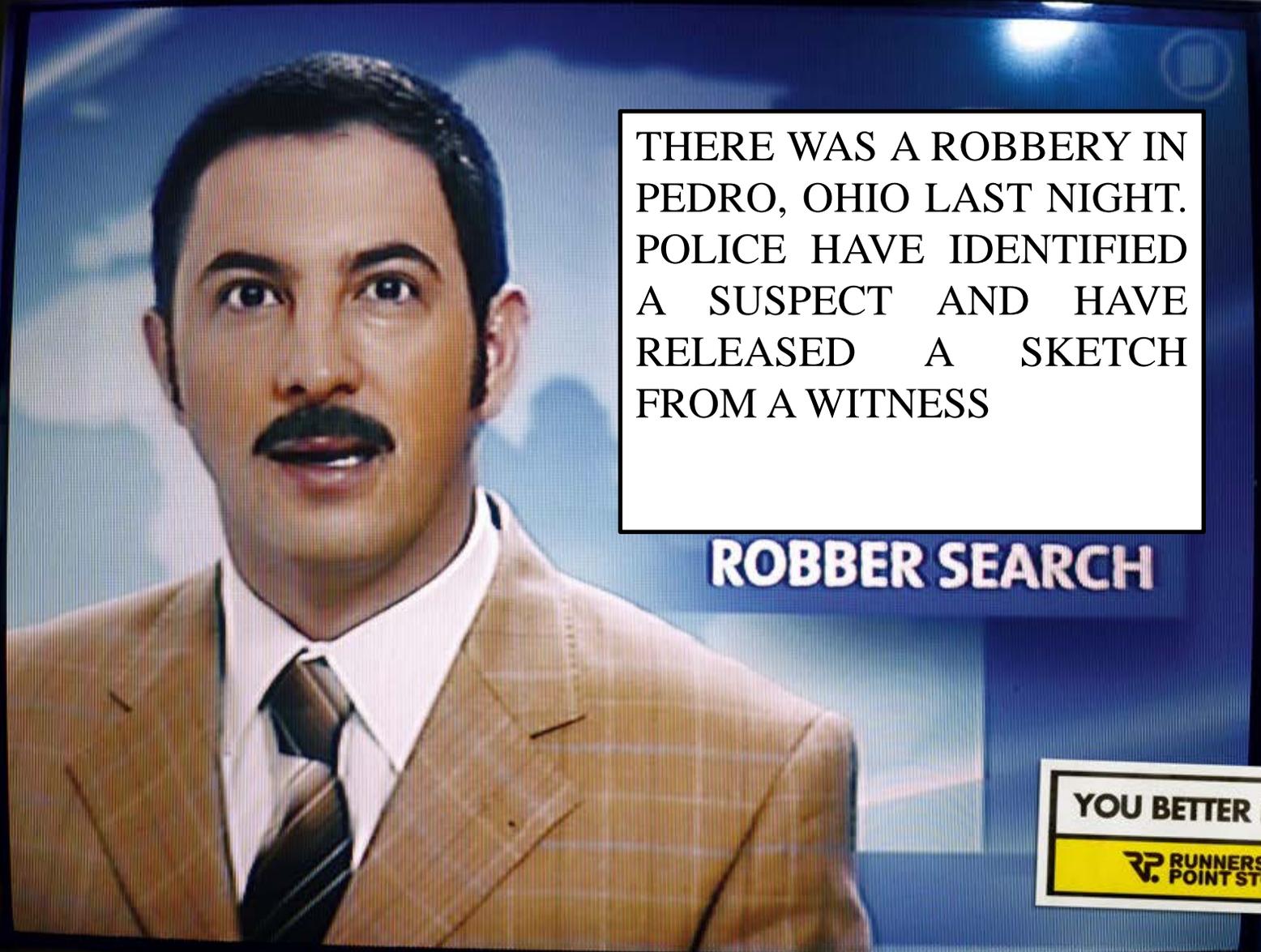
- Don't lose sight of the power of an image

## This Is Not A Visual

### To much text

- Do you know of an effect called the **picture superiority** effect. This effect says that if people are presented with a picture and text they are more likely to remember the picture than the text. **SO why is it that you see powerpoints with loads of text like this.** Is it because the speaker can not remember what they are saying or I have actually been in a presentation where I was told that the speaker did not want to insult my intelligence by reading it out for me and gave me a minute to read it myself. What was that all about. Do you get the point. Essays are for text Powerpoint presentations are for visual representation of what the speaker is talking about. It is meant to be an aid. **So don't put too much text on a slide. Use pictures if you can and use a spellck.**





THERE WAS A ROBBERY IN PEDRO, OHIO LAST NIGHT. POLICE HAVE IDENTIFIED A SUSPECT AND HAVE RELEASED A SKETCH FROM A WITNESS

**ROBBER SEARCH**

**YOU BETTER RUN.**

**RP RUNNERS  
POINT STORES**



**ROBBER SEARCH**

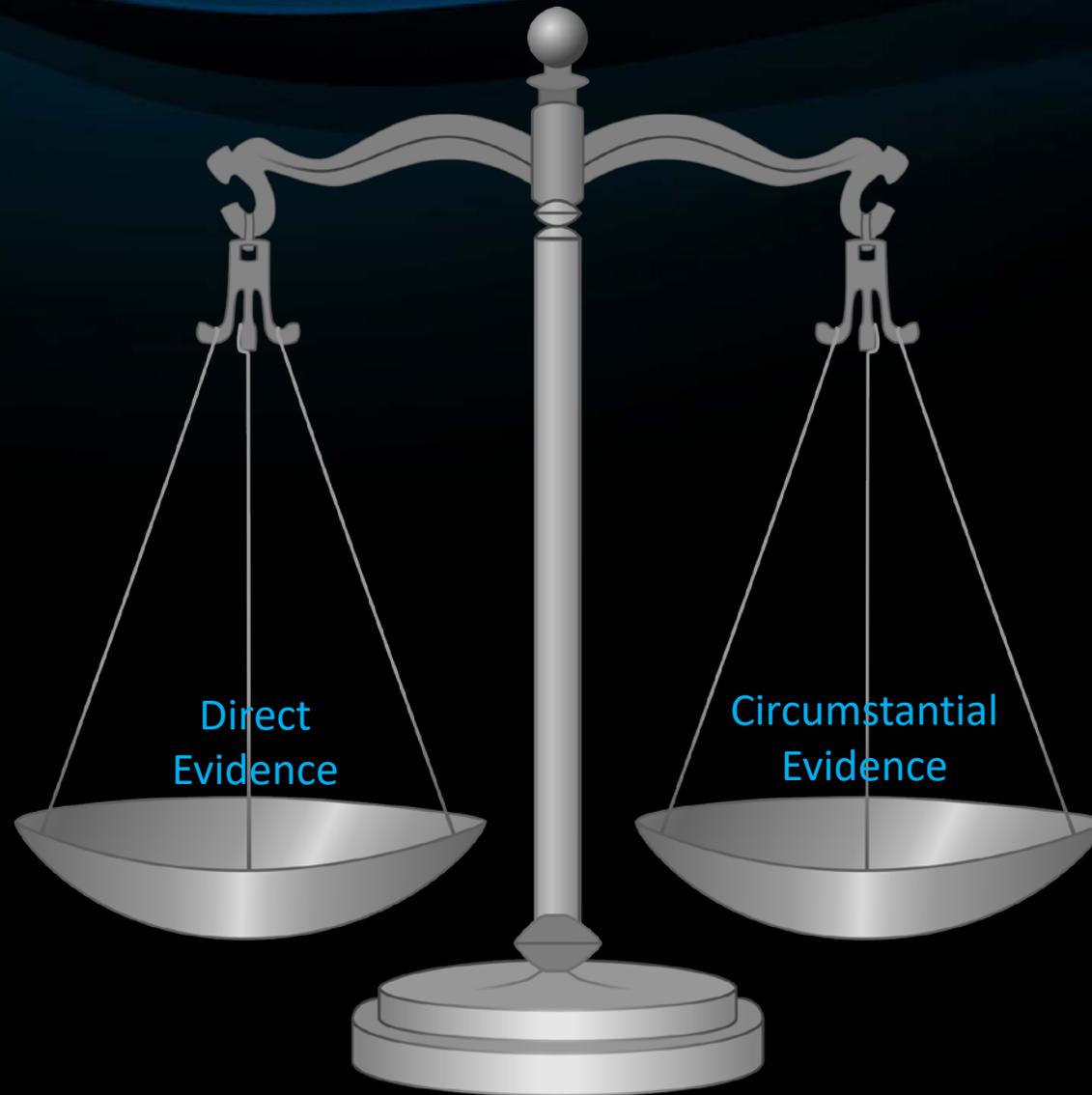
**YOU BETTER RUN.**

**RP** **RUNNERS  
POINT STORES**

# Direct vs. Circumstantial Evidence

Evidence may be direct or circumstantial. Direct evidence is the testimony of a witness who saw, heard, or otherwise sensed an event. Circumstantial evidence is the proof of a fact or facts from which you may find another fact. The law makes no distinction between direct and circumstantial evidence. It is for you to determine the importance to be given to the evidence, regardless of whether it is direct or circumstantial.

Jury instructions, Page 7



Direct  
Evidence

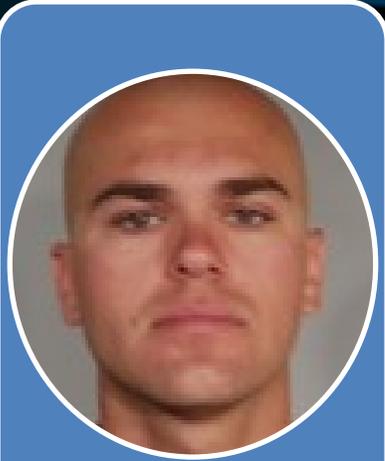
Circumstantial  
Evidence

Name	Number of Zeros	Groups of (3) Zeros
Ten	1	(10)
Hundred	2	(100)
Thousand	3	1(1,000)
Ten Thousand	4	(10,000)
Hundred Thousand	5	(100,000)
Million	6	2(1,000,000)
Billion	9	3(1,000,000,000)
Trillion	12	4(1000,000,000,000)
Quadrillion	15	5(1,000,000,000,000,000)
Quintillion	18	6(1,000,000,000,000,000,000)
<b>Sextillion</b>	<b>21</b>	<b>7(1,000,000,000,000,000,000,000)</b>
Septillion	24	8(1,000,000,000,000,000,000,000,000)
Octillion	27	9(1,000,000,000,000,000,000,000,000,000)
Nonillion	30	10(1,000,000,000,000,000,000,000,000,000,000)









Dennis  
Leiler



Michael  
Lopez



Destini  
Villinis

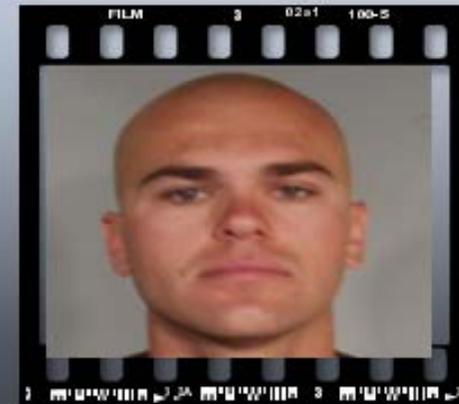


Juan  
Castillo





**May 26, 2010**

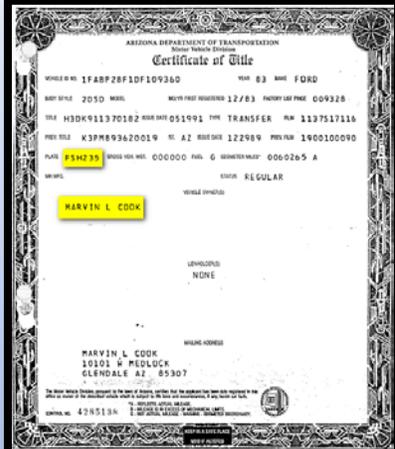


**November 4, 2010**

# Beyond Trial

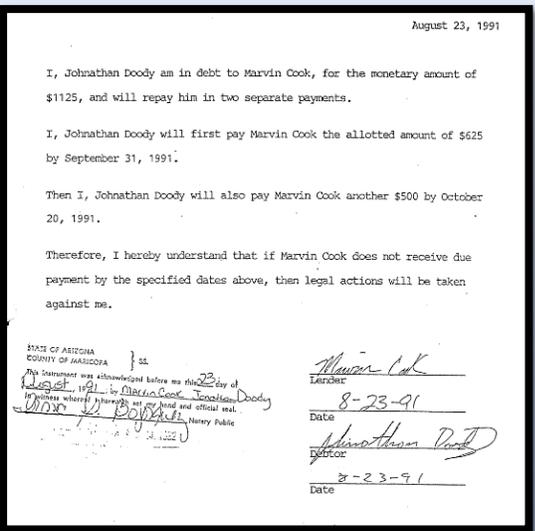
- Internal meetings/case assessment
- Motions/hearings
- Interviews/depositions
- Witness preparation



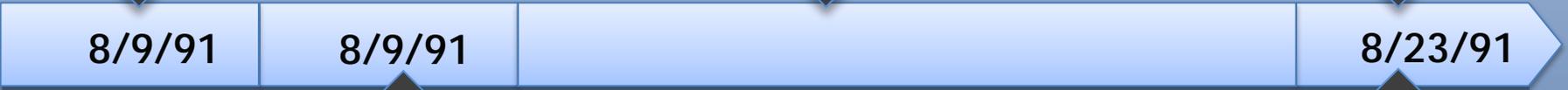


**Marvin Cook sells Mustang to DOODY for \$2,000 (TO BE PAID LATER)**

**DOODY pays Cook \$1,000**



**Doody borrows money from Cook**

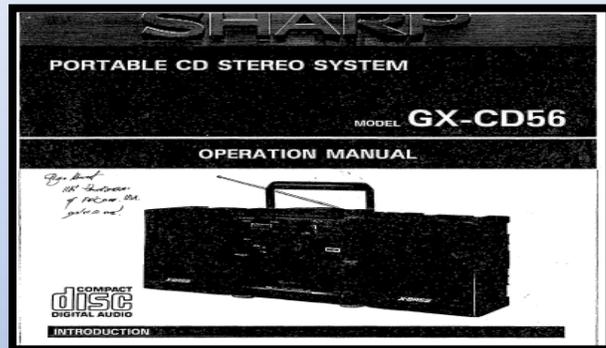


**Temple Murders**



**DOODY gives Cook a stereo as collateral**





User manual (Exhibit 236)  
found at Temple

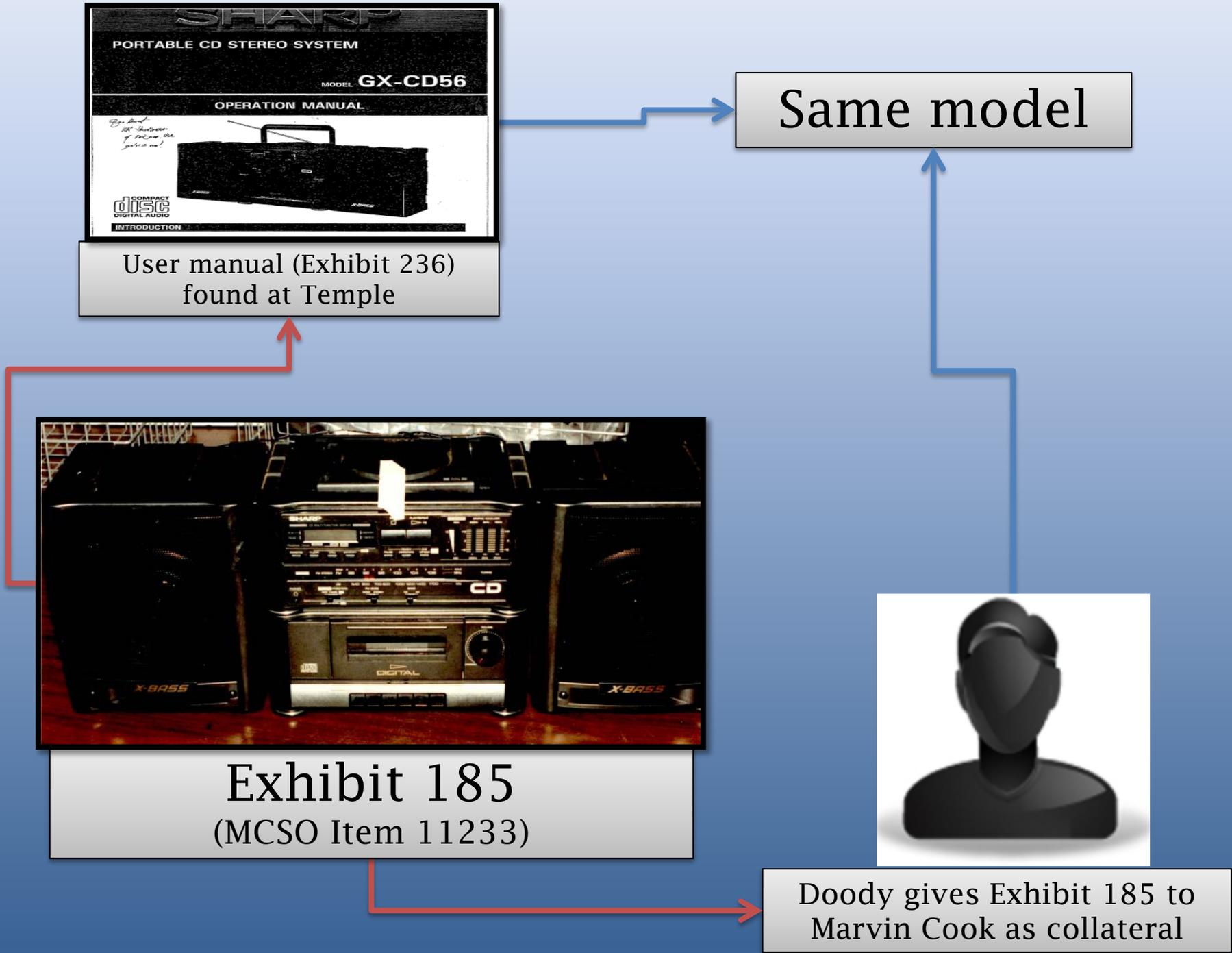
Same model



Exhibit 185  
(MCSO Item 11233)



Doody gives Exhibit 185 to  
Marvin Cook as collateral





Box (Exhibit 232) found at Temple

Same serial number



Exhibit 184  
(MCSO Item 17513)



Found at Alex Garcia's house



Box (Exhibit 235) found at Temple

Same serial number

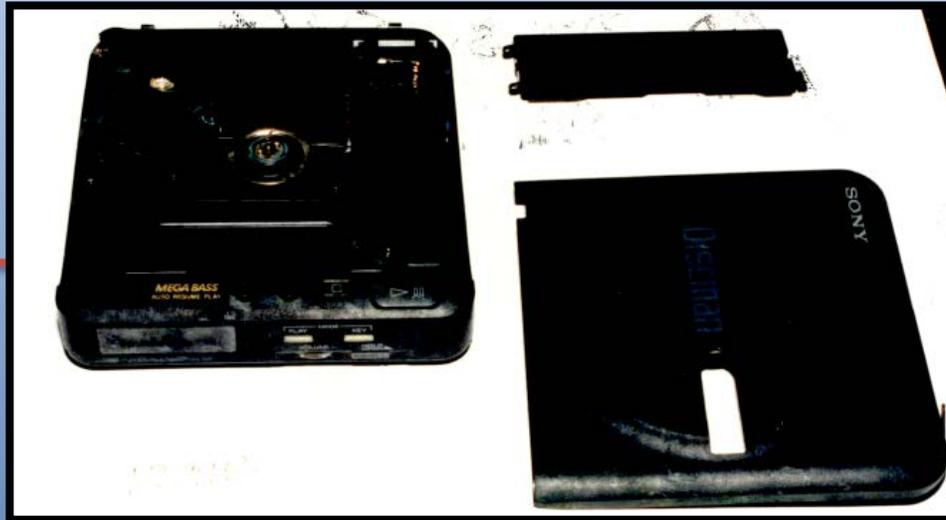


Exhibit 233  
(MCSO Item 17918)



In possession of Tim Davern  
Defendant claims it is his

Alex Garcia identifies these cameras  
as being similar to the ones Doody  
took from the Temple

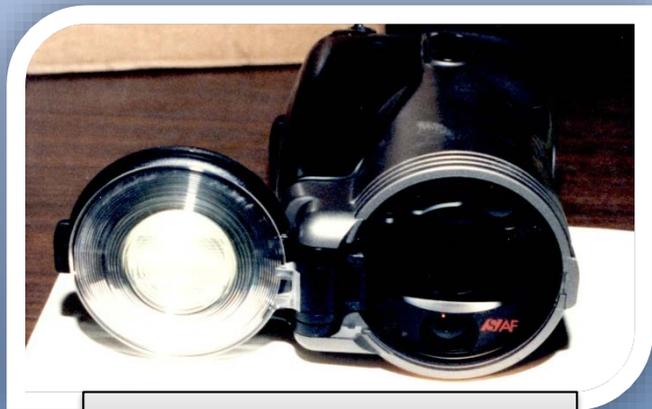


Exhibit 181

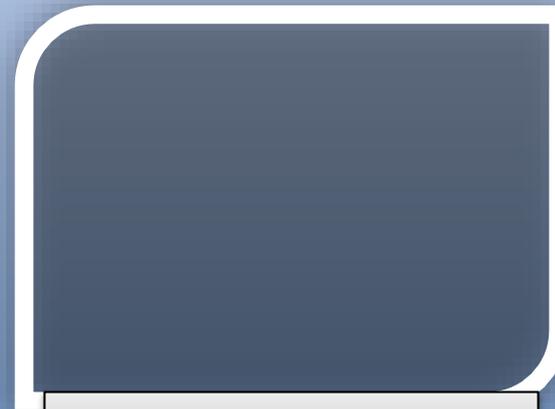


Exhibit 179

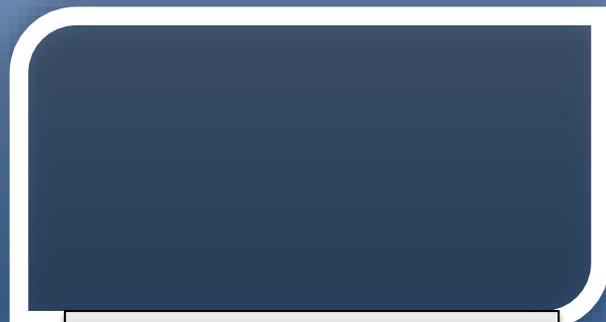


Exhibit 177

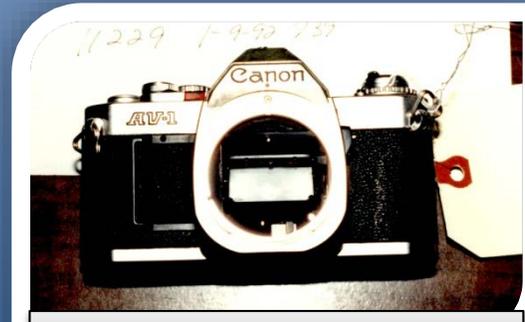


Exhibit 180

**October**

1991

Thursday

**3**

Angel Rowlett pawns  
four cameras stolen  
from Doody

**October**

1991

Saturday

**5**

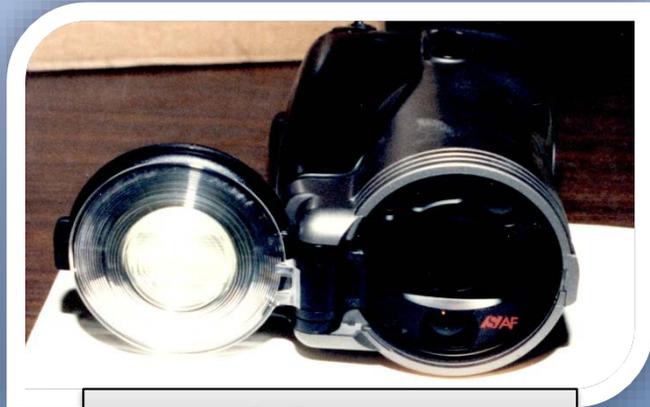


Exhibit 181

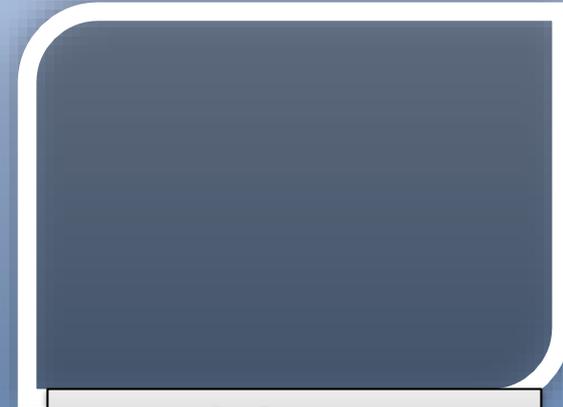


Exhibit 179

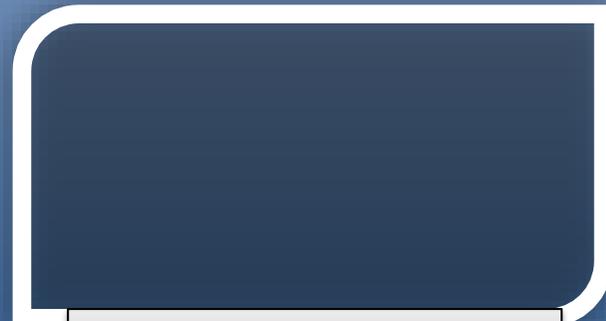


Exhibit 177

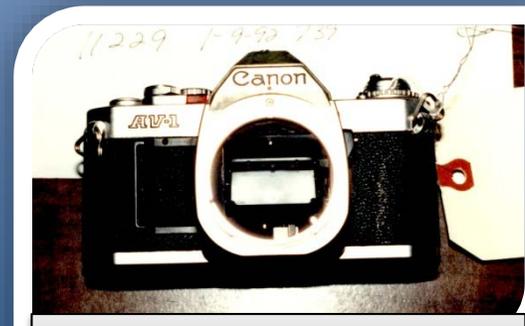


Exhibit 180



Sean C. leaves for work



Erik Pollard leaves the house



Sean C. gets home from work



Delilah M. leaves for work



Erik Pollard returns



The police arrive



# Autopsy of Xxx Xxxxx



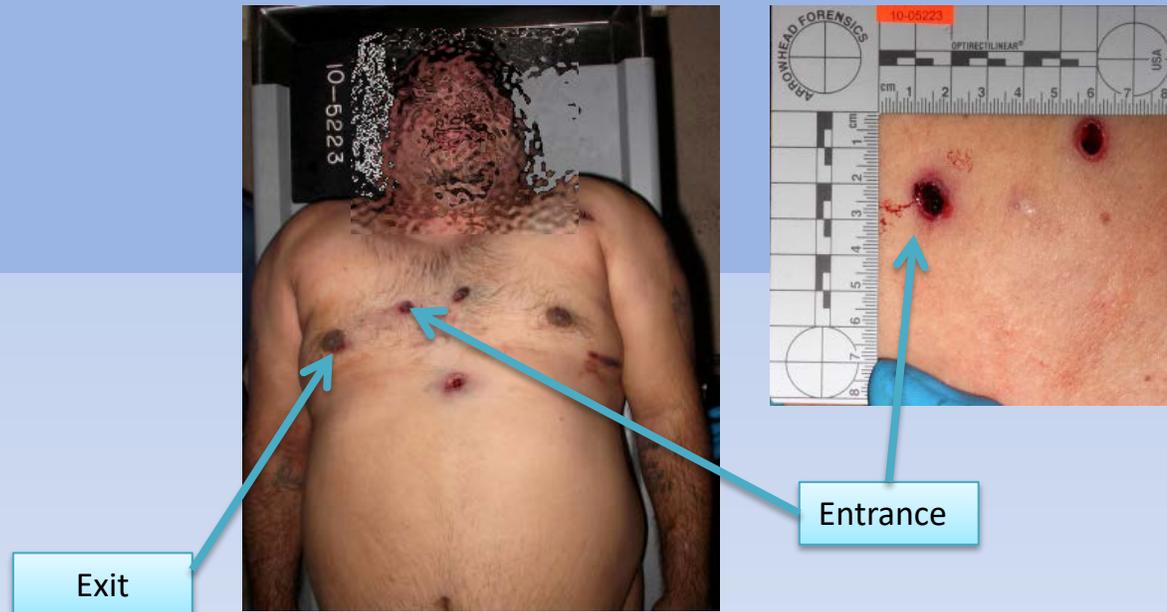
## Penetrating gunshot wound of the head "A"



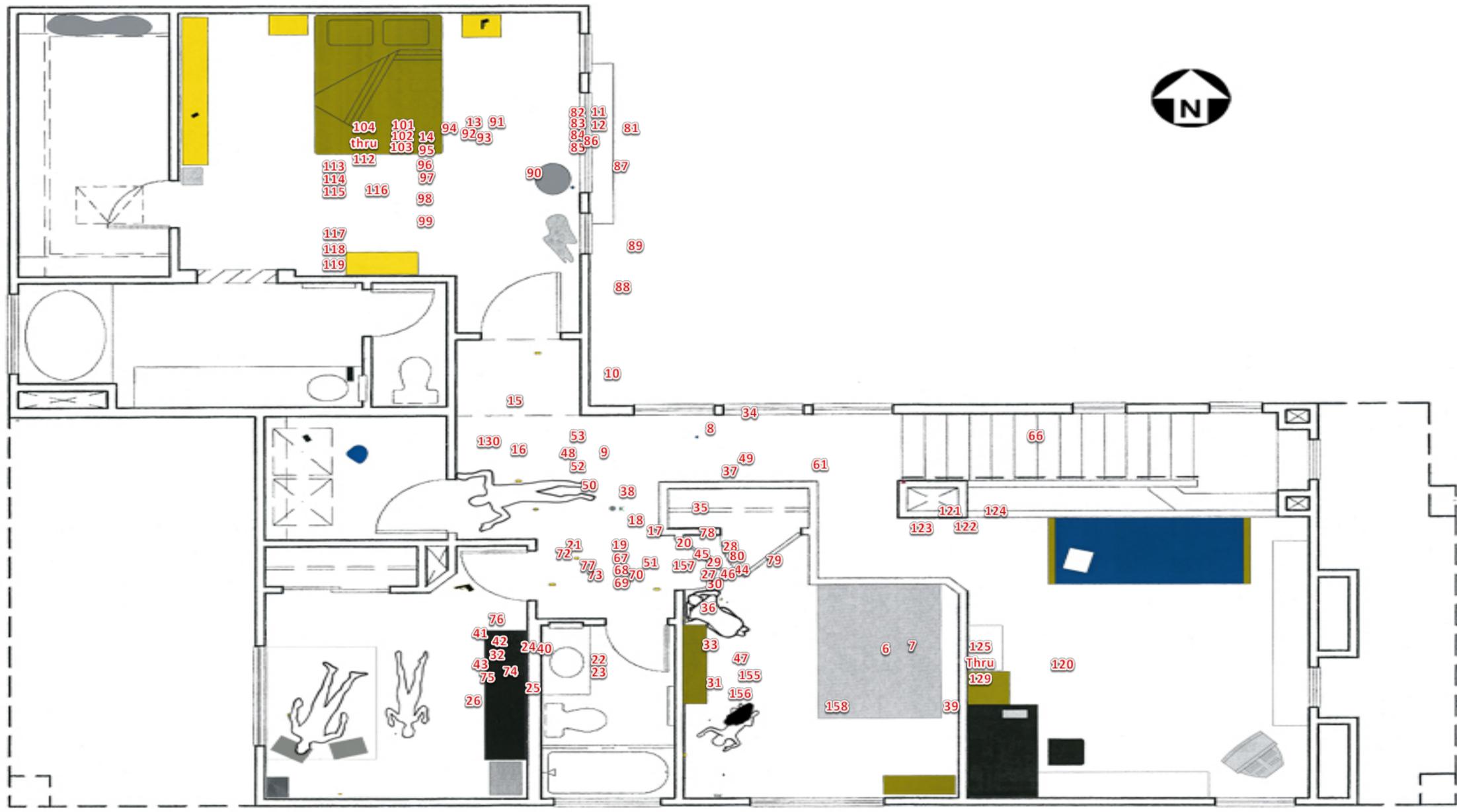
Entrance

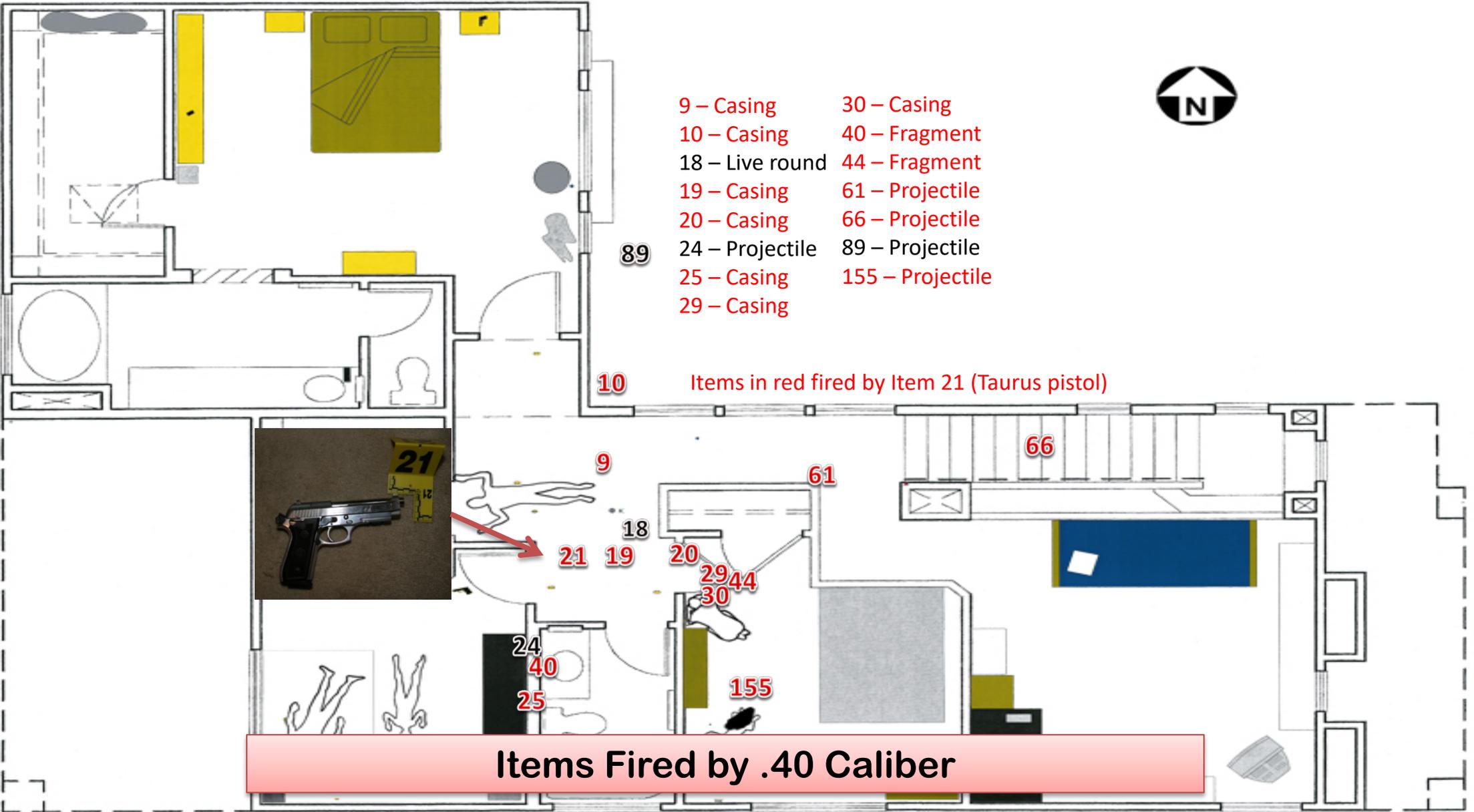
No exit wound  
Left to right

# Perforating gunshot wound of the medial right upper chest "B"



Left to right – slightly downward



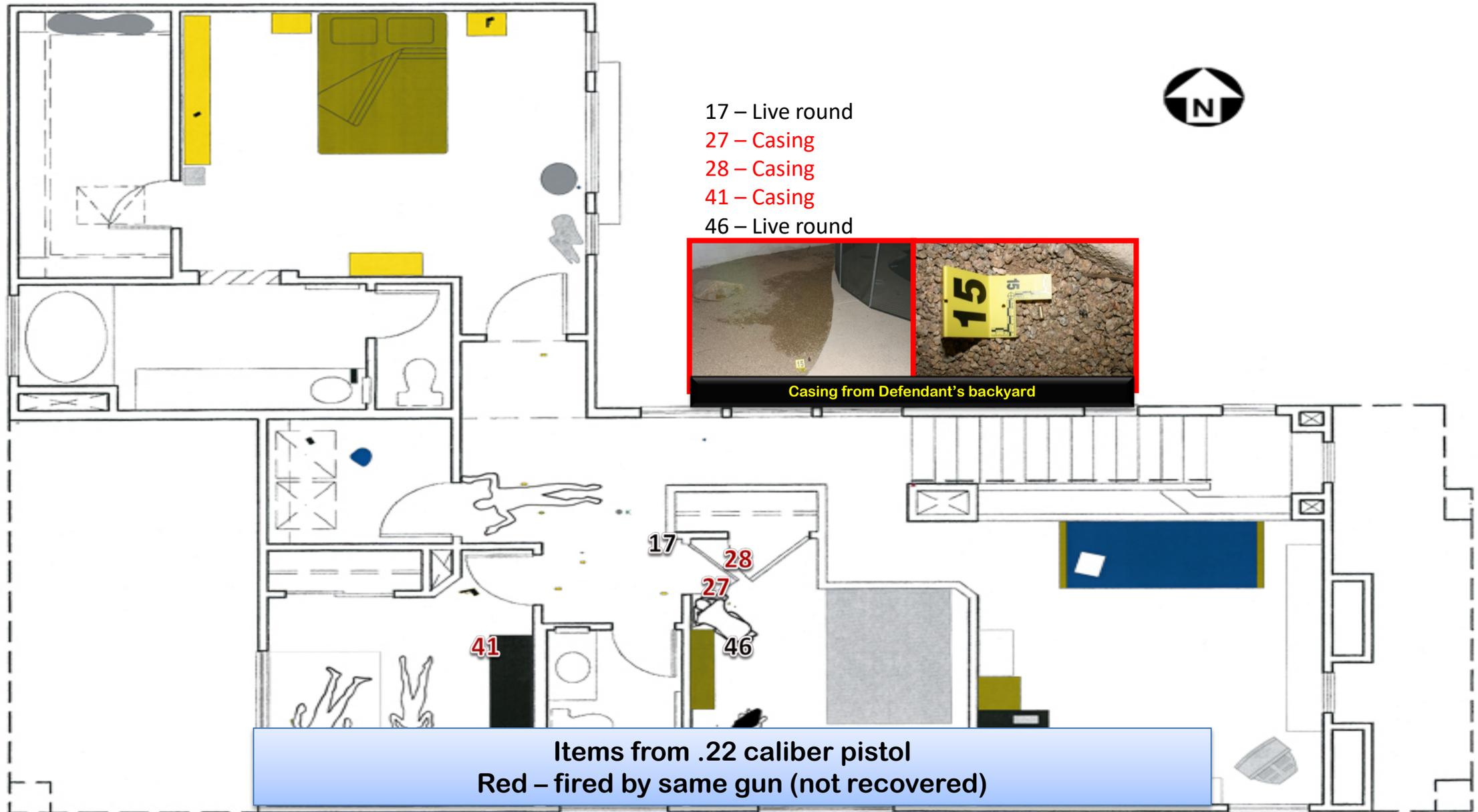




- 17 – Live round
- 27 – Casing
- 28 – Casing
- 41 – Casing
- 46 – Live round



Casing from Defendant's backyard





**The 21<sup>st</sup> Century Trial  
Part II**

**Jonathan Mosher  
Jason Kalish**

## Juror Notebooks

- Rule 18.6(d)(2)
- “To aid the jurors in performing their duties, the court may authorize the parties to provide the jurors with notebooks containing documents and exhibits.”

WILLIAM G MONTGOMERY  
MARICOPA COUNTY ATTORNEY

Jason Kalish  
Deputy County Attorney  
Bar ID #: 018429  
301 West Jefferson, 8th Floor  
Phoenix, AZ 85003  
Telephone: (602) 506-1159  
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MCAO Firm #: 00032000  
Attorney for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA

THE STATE OF ARIZONA,

Plaintiff,

vs.

Defendant.

████████████████████  
REQUEST TO USE JUROR NOTEBOOKS

(Assigned to the Honorable Erin O Otis,  
Div. CRJ04)

The State of Arizona, by and through undersigned counsel, asks the Court to authorize the use of juror notebooks pursuant to Rule 18.6(d)(2). This case involves two murders and multiple defendants. There will be dozens of photos, several expert witnesses and multiple diagrams. The State feels that juror notebooks will greatly increase the ability of the jurors to keep track of critical evidence. The State will facilitate the creation of the notebooks and will provide enough copies of photographs and diagrams.

Submitted December 21, 2018.

# Exhibit 104

Pawnbroker / Creditor / Lender  
**303 N. LITCHFIELD RD  
 GOODYEAR AZ 85338  
 (623) 544-8000**

**LOAN**

Pawnbroker's Name & Address: **MONTEZ LAVELL WRIGHT  
 333 E VANBUREN APT 165  
 AVONDALE AZ 85323  
 (248) 309-0801**

Original Loan No: **LT-S09038717**

Vehicle Type & No: **MICHIGAN ID W523609488500**

2016  
 1/28/2016

Year Make: **16 34-42**

Color	Make	Year	Height	Weight	Sex
BRN	BUK	BRN	6'1"	150 lbs	M

You are giving a Security Interest in the following pledged goods:  
**HEDGE TRIMMER, ECHO MODEL HC-235, SERIAL NUMBER S7231037251, GAS OPERATED TRIMMER**

**PAWN1ST.COM**  
 BUY • SELL • LOANS

**MATURITY DATE**  
 4/28/2016

**AMOUNT FINANCED:** \$80.00  
The amount of cash advanced to you net of finance charge.

**FINANCE CHARGE:** \$53.10  
The charge against the credit advanced to you.

**TOTAL OF PAYMENTS:** \$133.10  
Amount required to redeem your loan in full.

**ANNUAL PERCENTAGE RATE:** 265.5%  
The cost of loan credit as a percent of the amount of cash advanced to you.

**PAYMENT SCHEDULE:** \$ 5

**PAYMENT:** \$ 5

PREPAYMENT: If you prepay early, you may be entitled to a refund of some or all of the finance charge.

**YOU ARE NOT OBLIGATED TO REDEEM THE PLEDGED GOODS. THE PLEDGED GOODS WILL BE FORFEITED TO THE PAWNBROKER AFTER THE MATURITY DATE UNLESS THE PLEDGED GOODS ARE REDEEMED OR YOU ENTER INTO A NEW PAWN TRANSACTION FOR THE PLEDGED GOODS.**  
 By signing, I am stating that I agree to all terms and conditions on the front and back and acknowledge receipt of a copy of this agreement.  
 I also state, Under penalty of perjury, I have read the foregoing agreement, and the facts stated in it are true.

**X** *Montez Lavell Wright*  
 Pawnbroker's Signature

**NOTICE: See Reverse Side**

Apr #10-CSD-01 AZ 5167001 Smart Store Systems

Pawnshop Form B-0001 Printing Co., Inc. 800-620-1234

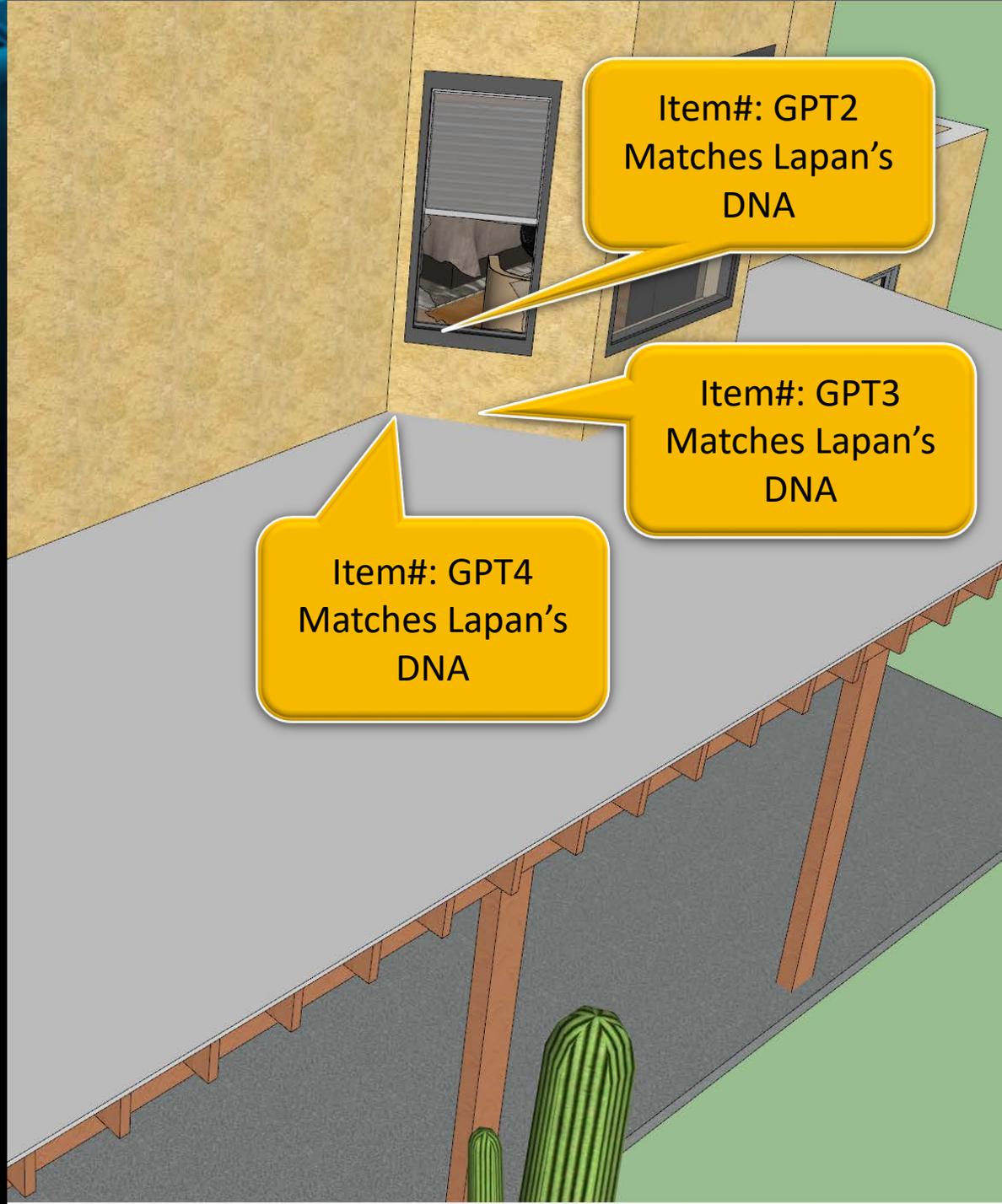
Did you know we also offer  
**TITLE LOANS**

Visit us at [www.Pawn1st.com](http://www.Pawn1st.com) for details.  
 +  
 View your loans online at [www.buya.com](http://www.buya.com).



## The Visual Trial

- What else should visuals do?
  - Help jury understand scene
  - Do not underestimate
    - Jury seeing for first time
    - They don't control clicker



Item#: GPT2  
Matches Lapan's  
DNA

Item#: GPT3  
Matches Lapan's  
DNA

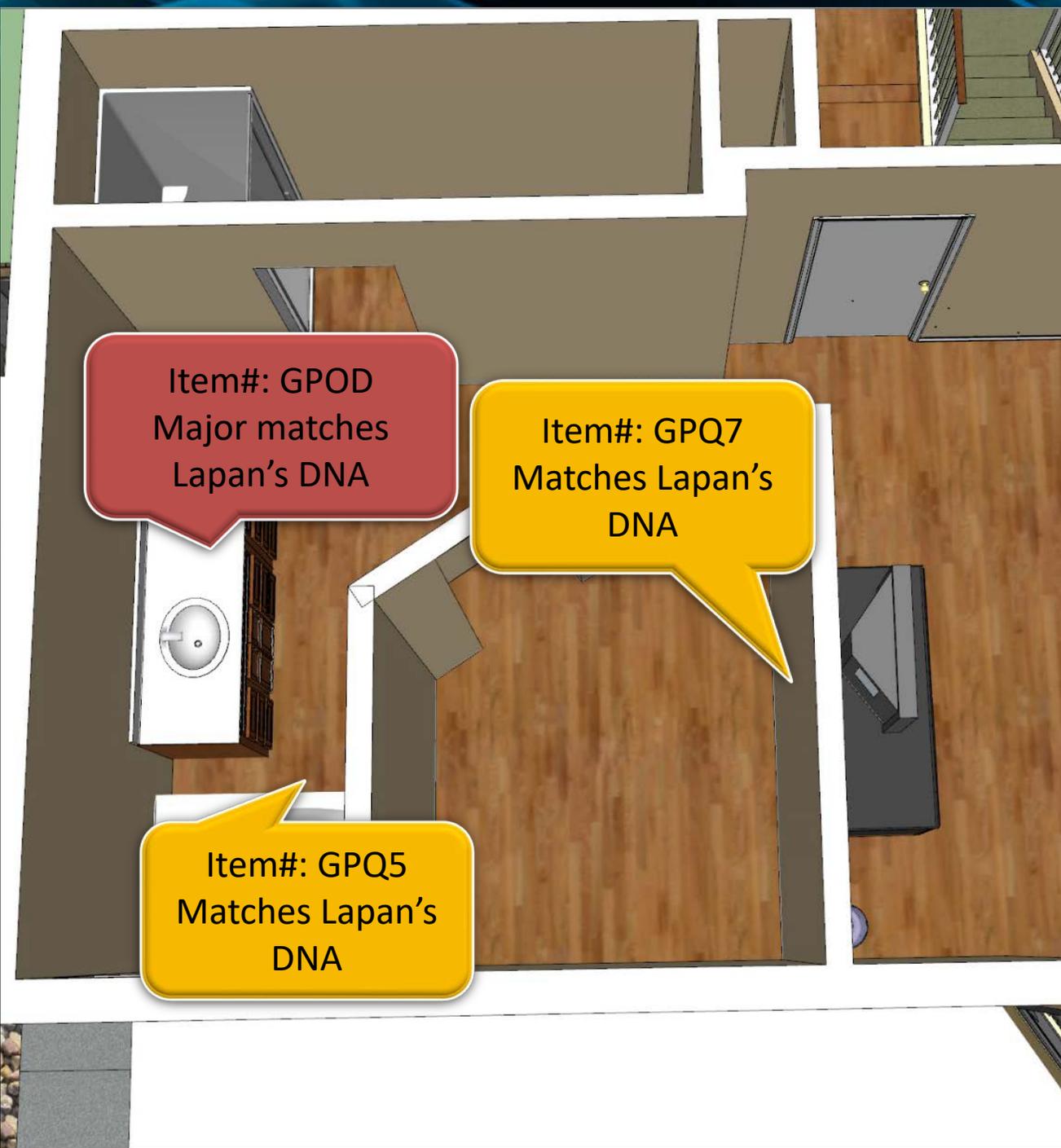
Item#: GPT4  
Matches Lapan's  
DNA

## Swabs Collected & Tested

GPT2: Outside window sill

GPT3: Exterior wall

GPT4: Top of patio under window



## Swabs Collected & Tested

GPQ5: Mouth wash cap

GPQ7: Closet wall

GPOD: Countertop  
between sinks



Item#: GPQ3  
Complex  
mixtures

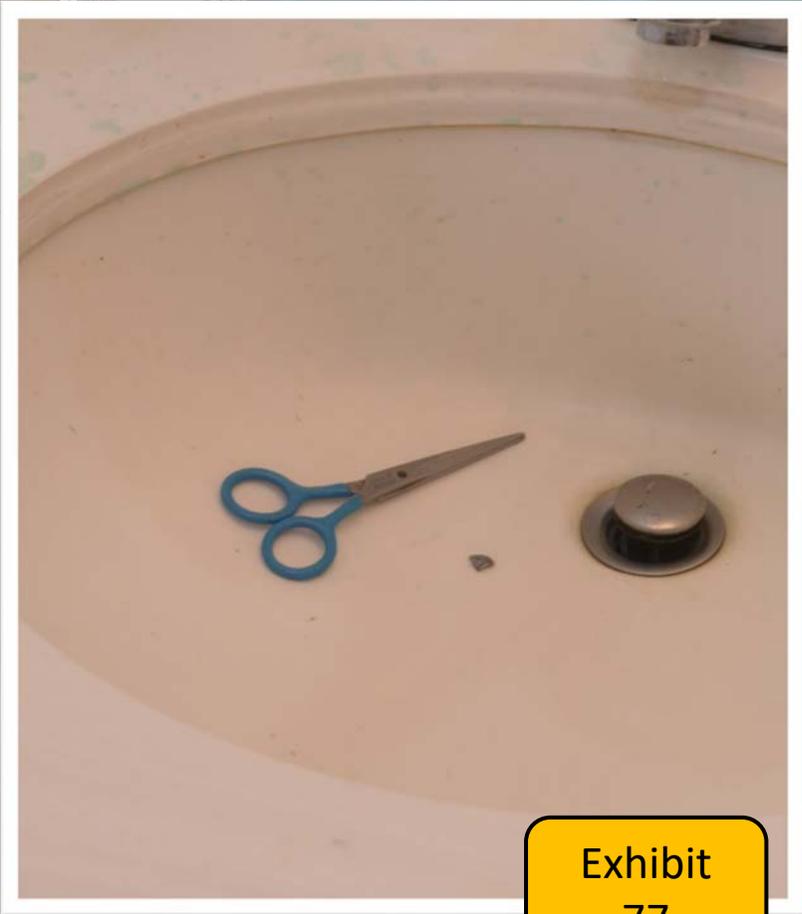


Exhibit  
77

## The Visual Trial

- Consider handouts for juror notebooks
  - Remember the learning process!
  - Jury can reference as needed
  - Works well for dense, complex material

# DNA RESULTS- SCISSORS (NICK'S BATHROOM)

LOCUS/ITEM	GPQ3 (18-00284.01) Scissors (handle)	GPQ3 (18-00284.02) Scissors (blade)	OME7 (18-03836.01) Bloodstain card from Nicolas Dallies Morelos Sr.	JLS2 (18-03837.01) Buccal swabs for James Lapan Jr.
Amelogenin	X,Y	X,Y	X,Y	X,Y
D3S1358	15,16	14,15,16	15,16	15,16
D1S1656	11,12,15,16	11,12,15,16	15,16	11,12
D2S441	10,11,12	10,11,12	10,12	11,12
D10S1248	13	13,14,15	14,15	13
D13S317	8,9,11	8,9,11	9	8,11
Penta E	5	5,11,12	11,14	5,12
D16S539	9,10,11,12,13	10,11,12,13	10,12	11,12
D18S51	10,12,15	10,12,15	15	10,12
D2S1338	20,23,26	20,23,25,26	25,26	20,23
CSF1PO	10,12,13	10,11,12,13	10,11	12,13
Penta D	10	8,10,12	8,9	10,12
TH01	7,8,9,9.3	6,7,8,9,9.3	7,8	9,9.3
vWA	16,17,18,19	16,17,18,19	17	16,19
D21S11	28,29,30,32.2	28,29,30,31.2,32.2	29,30	28,32.2
D7S820	11,13	11,12,13	11,13	11
D5S818	9,10	9,10,11,13	11,13	9,10
TPOX	8	8,9	8,9	8,9
D8S1179	10,13,15	10,11,12,13,14,15	10,13	13,15
D12S391	18,19,20,22	17,18,19,20,22	19,20	18,22
D19S433	13,14,15,16	13,14,15,16	13,15	15,16
SE33	16,18,26.2	16,18,23.2,25.2,26.2	16,23.2	18,26.2
D22S1045	15	11,15,16	15,16	11,15
DYS391	9,10,11	10,11	10	11
FGA	19,20,22,25	19,20,22,25	19,22	22,25
DYS576	16,17	17	17	17
DYS570	16	16	17	16

Nick Morelos



James Lapan



Shared



Exhibit  
371

## The Visual Trial

- Handouts work well for:
  - Lists of evidence items
  - Scene diagrams
  - Maps (multiple key locations)
  - Complex/voluminous expert conclusions
  - Dates/ages/grades, etc.

# Non-visual visuals

## 3. June 21, 2018 Report:

### a. GPQ3 (Scissors)

#### i. Entire handle

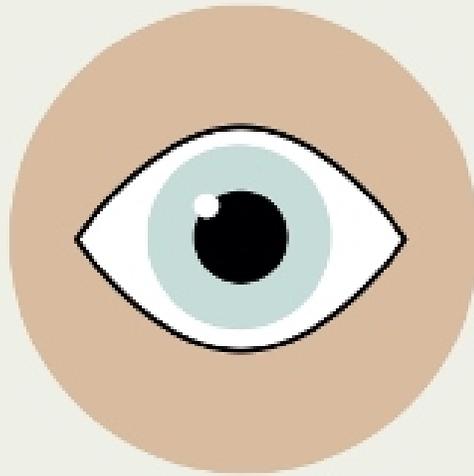
1. Mixture of 3+ individuals
2. At least one male contributor
3. Nicolas Morelos and James Lapan could not be ruled out as contributors to this mixture
  
4. 41 times more probable if Contributor #2 originated from Nicolas Morelos and 2 unknown persons than if it originated from 3 unknown persons
  - a. Likelihood ratio is uninformative as to Nicolas Morelos
  
5. 40 billion times more probable if Contributor #1 originated from James Lapan and 2 unknown persons than if it originated from 3 unknown persons
  - a. Extremely strong support for the proposition that James Lapan and 2 unknown persons contributed to this mixed profile, rather than 3 unknown persons

## The Visual Trial

- What else should visuals do?
  - Underscore the strength of your case
  - Make abstract concepts memorable

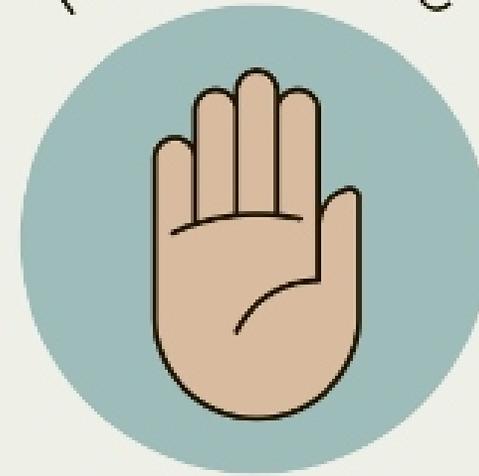
Name	Number of Zeros	Groups of (3) Zeros
Ten	1	(10)
Hundred	2	(100)
Thousand	3	1(1,000)
Ten Thousand	4	(10,000)
Hundred Thousand	5	(100,000)
Million	6	2(1,000,000)
Billion	9	3(1,000,000,000)
Trillion	12	4(1000,000,000,000)
Quadrillion	15	5(1,000,000,000,000,000)
Quintillion	18	6(1,000,000,000,000,000,000)
<b>Sextillion</b>	<b>21</b>	<b>7(1,000,000,000,000,000,000,000)</b>
Septillion	24	8(1,000,000,000,000,000,000,000,000)
Octillion	27	9(1,000,000,000,000,000,000,000,000,000)
Nonillion	30	10(1,000,000,000,000,000,000,000,000,000,000)

VISUAL



AUDITORY

KINESTHETIC

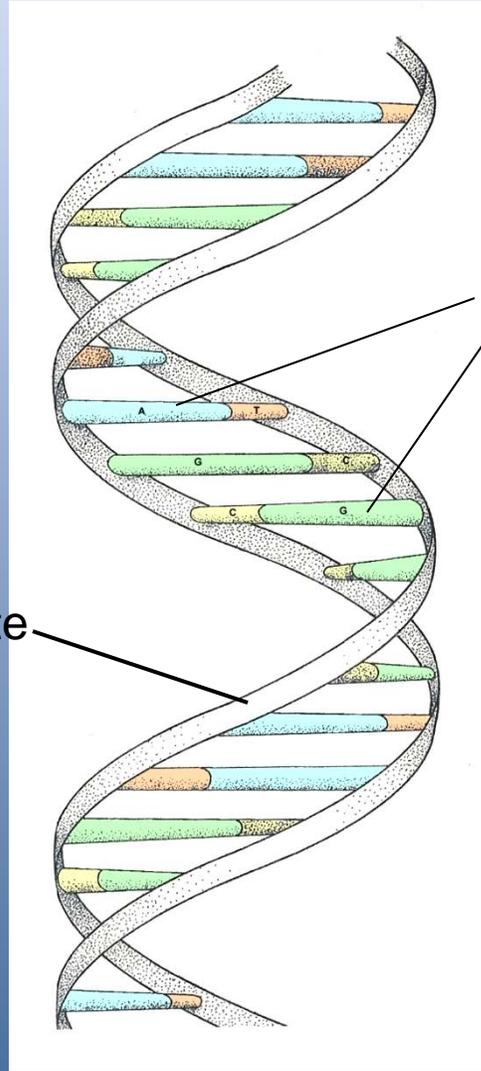


# Who decides your trial

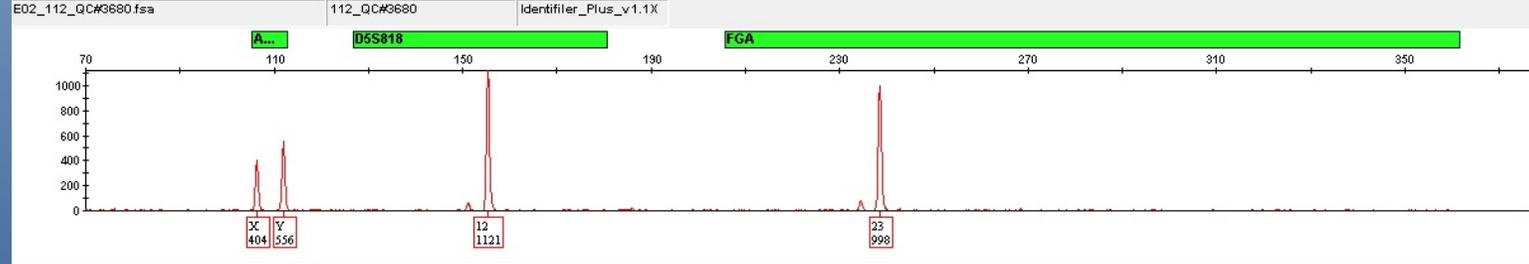
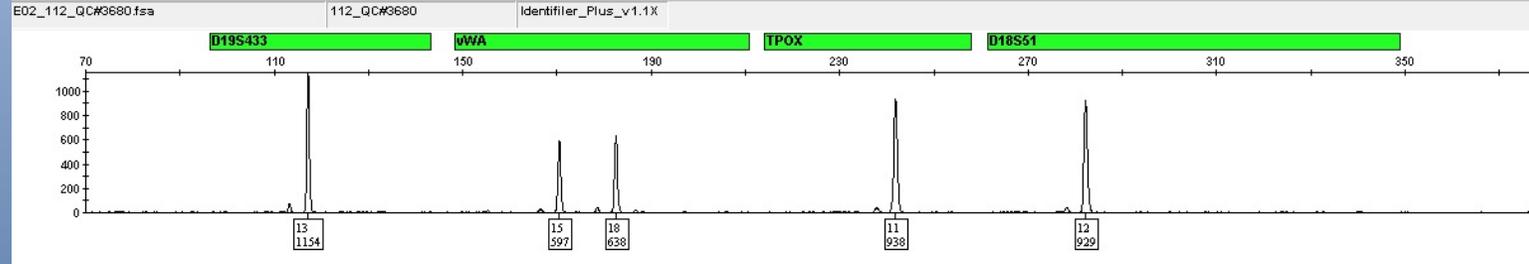
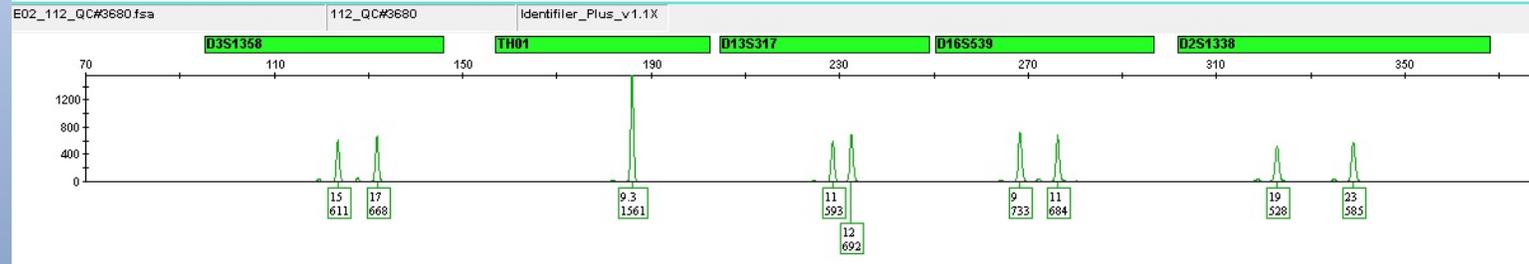
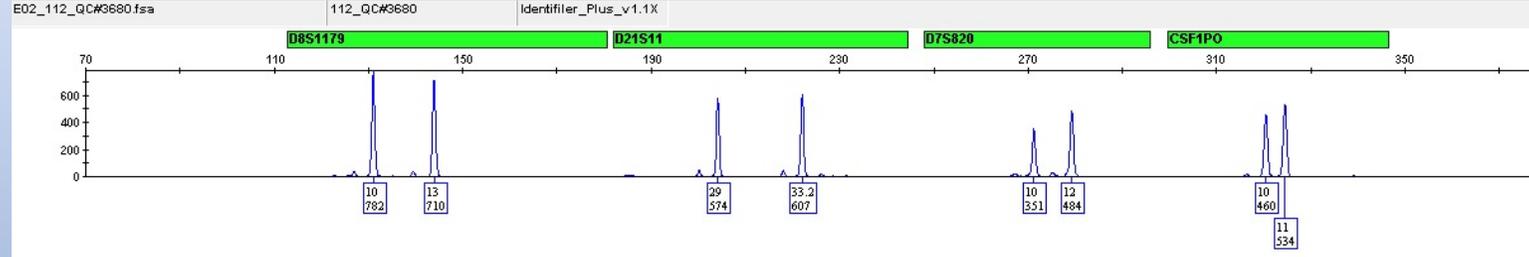


# THE DOUBLE HELIX

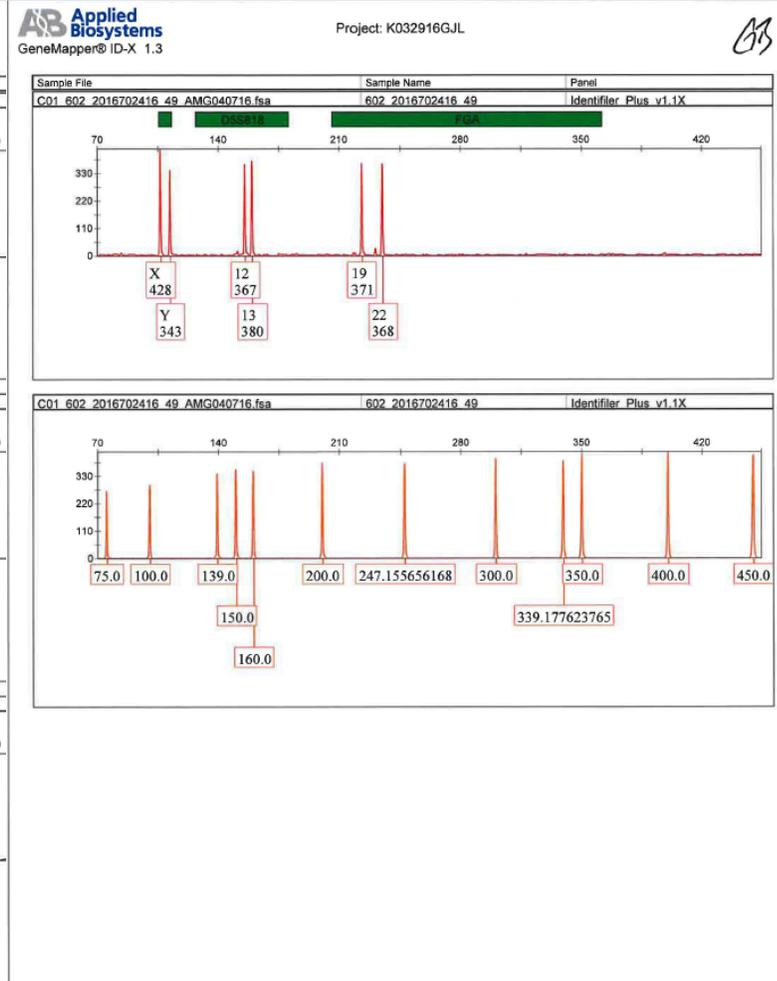
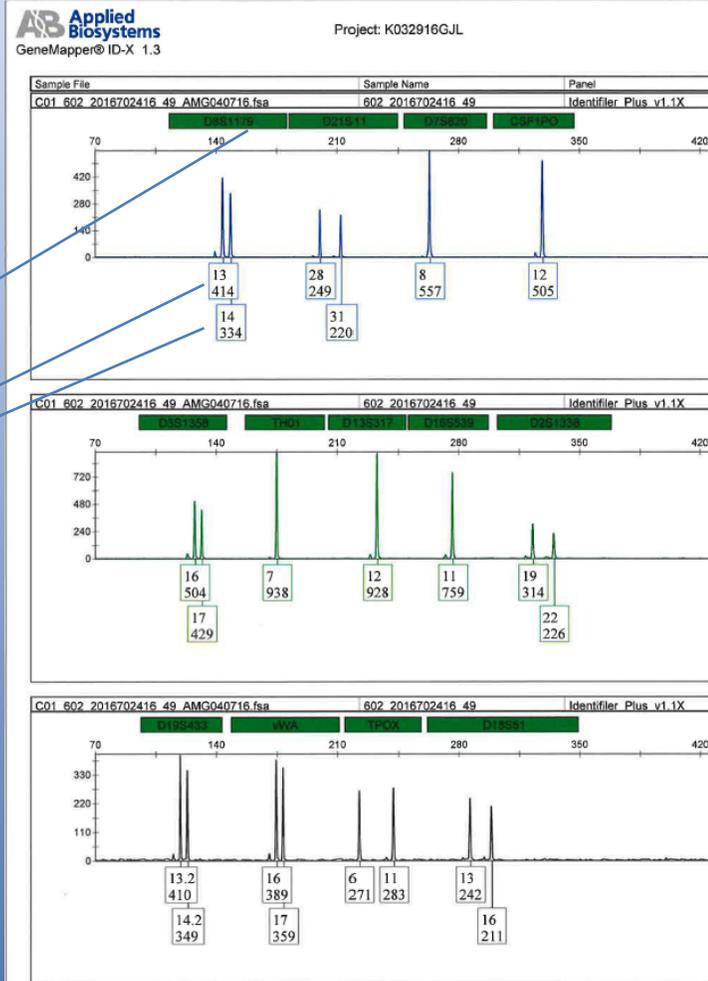
sugar-phosphate  
chain



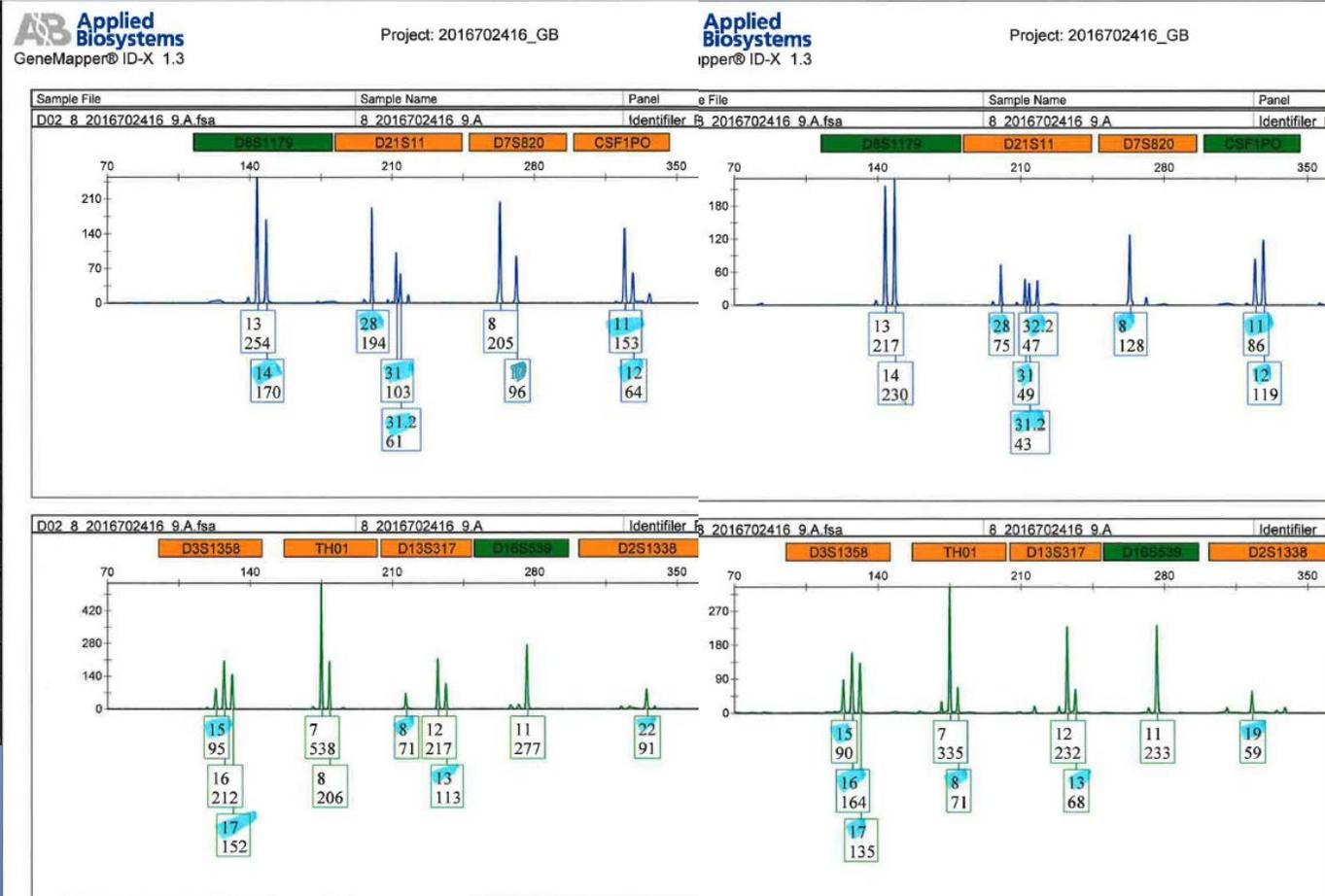
bases



	49
<b>LOCUS</b>	Montez Wright
<b>D8S1179</b>	13,14
<b>D21S11</b>	28,31
<b>D7S820</b>	8,8
<b>CSF1PO</b>	12,12
<b>D3S1358</b>	16,17
<b>TH01</b>	7,7
<b>D13S317</b>	12,12
<b>D16S539</b>	11,11
<b>D2S1338</b>	19,22
<b>D19S433</b>	13.2,14.2
<b>vWA</b>	16,17
<b>TPOX</b>	6,11
<b>D18S51</b>	13,16
<b>AMEL</b>	X,Y
<b>D5S818</b>	12,13
<b>FGA</b>	19,22



LOCUS	49	9.A
	Montez Wright	Two swabs from stain on screen of phone
D8S1179	13,14	13,14
D21S11	28,31	[28,31,31.2]
D7S820	8,8	8,[10]
CSF1PO	12,12	11,[12]
D3S1358	16,17	16,[15,17]
TH01	7,7	7,(8)
D13S317	12,12	12,[13]
D16S539	11,11	11
D2S1338	19,22	[19,22]
D19S433	13.2,14.2	13.2,[12,14.2]
vWA	16,17	[16,17,18]
TPOX	6,11	[8,11]
D18S51	13,16	[13,16]
AMEL	X,Y	X,[Y]
D5S818	12,13	[11,12,13]
FGA	19,22	[19,22,23]



	Item # and Sample Description							
	8.A	9.A	9.B	9.B	9.C	9.C	41	49
LOCUS	Two swabs from ends of battery	Two swabs from stain on screen of phone	Two swabs from letter keys on phone	GODIG Entry	Two swabs from inside back edges of phone	GODIG Entry	Andrew Lauro	Montez Wright
D8S1179	[13]	13,14	13,14	13,14	13,14,[15]	13,14	13,14	13,14
D21S11	INC	[28,31,31.2]	28,31,[30,32.2]	28,31	28,31.2,[31,32.2]	28,31.2	30,32.2	28,31
D7S820	INC	8,[10]	8,[10]	8,8	8,10,[11]	8,10	8,[10]	8,8
CSF1PO	INC	11,[12]	12,[11,14]	12,12	11,12,[10,14]	11,12	11,14	12,12
D3S1358	[17]	16,[15,17]	15,16,17	15,16,17	15,16,17	15,16	15,15	16,17
TH01	[7]	7,(8)	7,(6,8)	6,7,8	7,(8)	7+,8	6,8	7,7
D13S317	INC	12,[13]	12,[8,10,13]	12,12	12,(13)	12+,13	8,10	12,12
D16S539	[11]	11	11,(10),[9]	11,11	11,[10]	11,11	9,10	11,11
D2S1338	INC	[19,22]	19,22,[16,21,23]	19,22	21,22,23,[17,19,20]	21,22,23	16,23	19,22
D19S433	[12]	13.2,[12,14.2]	13.2,14.2,(12,14,15.2)	13.2,14.2	12,(13.2,14.2),[13,14]	12,12	14,[15.2]	13.2,14.2
vWA	INC	[16,17,18]	16,17,[18]	16,17	16,17,18	16,17,18	17,18	16,17
TPOX	INC	[8,11]	6,8,11,[9]	6,11	6,8,11	8,11	8,9	6,11
D18S51	INC	[13,16]	13,16,[14,15]	13,16	13,16,[15]	13,16	13,14	13,16
AMEL	[X]	X,[Y]	X,Y	X,Y	X,(Y)	X,X	X,Y	X,Y
D5S818	INC	[11,12,13]	12,13,[11]	11,12,13	8,11,[12,13]	8,11,12,13	11,[13]	12,13
FGA	INC	[19,22,23]	19,22,[21,23,24]	19,22	22,23,[19,24]	19,22,23,24	[21,24]	19,22
CODIS				Forensic Mixture		Forensic Mixture	Suspect Known	Suspect Known

Item Number	Item	Results
8.A	Ends of phone battery	
9.A	Stain on screen of phone	
9.B	Letter keys on phone	
9.C	Inside back edges of phone	



Item Number	Item	Results
8.A	Ends of phone battery	Insufficient DNA
9.A	Stain on screen of phone	
9.B	Letter keys on phone	
9.C	Inside back edges of phone	



Item Number	Item	Results
8.A	Ends of phone battery	Insufficient DNA
9.A	Stain on screen of phone	Insufficient DNA – mixture
9.B	Letter keys on phone	
9.C	Inside back edges of phone	



Item Number	Item	Results
8.A	Ends of phone battery	Insufficient DNA
9.A	Stain on screen of phone	Insufficient DNA – mixture
9.B	Letter keys on phone	Mixture of three individuals – Wright (1 in 640 African Americans) – Lauro (1 in 540 Hispanics)
9.C	Inside back edges of phone	



Item Number	Item	Results
8.A	Ends of phone battery	Insufficient DNA
9.A	Stain on screen of phone	Insufficient DNA – mixture
9.B	Letter keys on phone	Mixture of three individuals – Wright (1 in 640 African Americans) – Lauro (1 in 540 Hispanics)
9.C	Inside back edges of phone	Mixture – Wright cannot be excluded (1 in 2,100 African Americans) Lauro excluded





Mixture of at least three individuals. Consistent with Barbara Leslie and Montez Wright.

88,000,000,000,000 times more likely to be Leslie and Wright than a random African American male.

1,100,000,000,000,000 times more likely to be Leslie and Wright than a random Hispanic male.

27,000,000,000,000,000 times more likely to be Leslie and Wright than a random Caucasian male.

# DNA RESULTS- SCISSORS (NICK'S BATHROOM)

LOCUS/ITEM	GPQ3 (18-00284.01) Scissors (handle)	GPQ3 (18-00284.02) Scissors (blade)	OME7 (18-03836.01) Bloodstain card from Nicolas Dallies Morelos Sr.	JLS2 (18-03837.01) Buccal swabs for James Lapan Jr.
Amelogenin	X,Y	X,Y	X,Y	X,Y
D3S1358	15,16	14,15,16	15,16	15,16
D1S1656	11,12,15,16	11,12,15,16	15,16	11,12
D2S441	10,11,12	10,11,12	10,12	11,12
D10S1248	13	13,14,15	14,15	13
D13S317	8,9,11	8,9,11	9	8,11
Penta E	5	5,11,12	11,14	5,12
D16S539	9,10,11,12,13	10,11,12,13	10,12	11,12
D18S51	10,12,15	10,12,15	15	10,12
D2S1338	20,23,26	20,23,25,26	25,26	20,23
CSF1PO	10,12,13	10,11,12,13	10,11	12,13
Penta D	10	8,10,12	8,9	10,12
TH01	7,8,9,9.3	6,7,8,9,9.3	7,8	9,9.3
vWA	16,17,18,19	16,17,18,19	17	16,19
D21S11	28,29,30,32.2	28,29,30,31.2,32.2	29,30	28,32.2
D7S820	11,13	11,12,13	11,13	11
D5S818	9,10	9,10,11,13	11,13	9,10
TPOX	8	8,9	8,9	8,9
D8S1179	10,13,15	10,11,12,13,14,15	10,13	13,15
D12S391	18,19,20,22	17,18,19,20,22	19,20	18,22
D19S433	13,14,15,16	13,14,15,16	13,15	15,16
SE33	16,18,26.2	16,18,23.2,25.2,26.2	16,23.2	18,26.2
D22S1045	15	11,15,16	15,16	11,15
DYS391	9,10,11	10,11	10	11
FGA	19,20,22,25	19,20,22,25	19,22	22,25
DYS576	16,17	17	17	17
DYS570	16	16	17	16

Nick Morelos 

James Lapan 

Shared 

Exhibit  
371

# Non-visual visuals

## 3. June 21, 2018 Report:

### a. GPQ3 (Scissors)

#### i. Entire handle

1. Mixture of 3+ individuals
2. At least one male contributor
3. Nicolas Morelos and James Lapan could not be ruled out as contributors to this mixture
  
4. 41 times more probable if Contributor #2 originated from Nicolas Morelos and 2 unknown persons than if it originated from 3 unknown persons
  - a. Likelihood ratio is uninformative as to Nicolas Morelos
  
5. 40 billion times more probable if Contributor #1 originated from James Lapan and 2 unknown persons than if it originated from 3 unknown persons
  - a. Extremely strong support for the proposition that James Lapan and 2 unknown persons contributed to this mixed profile, rather than 3 unknown persons

	Item # and Sample Description							
	8.A	9.A	9.B	9.B	9.C	9.C	41	49
LOCUS	Two swabs from ends of battery	Two swabs from stain on screen of phone	Two swabs from letter keys on phone	GODIG Entry	Two swabs from inside back edges of phone	GODIG Entry	Andrew Lauro	Montez Wright
D8S1179	[13]	13,14	13,14	13,14	13,14,[15]	13,14	13,14	13,14
D21S11	INC	[28,31,31.2]	28,31,[30,32.2]	28,31	28,31.2,[31,32.2]	28,31.2	30,32.2	28,31
D7S820	INC	8,[10]	8,[10]	8,8	8,10,[11]	8,10	8,[10]	8,8
CSF1PO	INC	11,[12]	12,[11,14]	12,12	11,12,[10,14]	11,12	11,14	12,12
D3S1358	[17]	16,[15,17]	15,16,17	15,16,17	15,16,17	15,16	15,15	16,17
TH01	[7]	7,(8)	7,(6,8)	6,7,8	7,(8)	7+,8	6,8	7,7
D13S317	INC	12,[13]	12,[8,10,13]	12,12	12,(13)	12+,13	8,10	12,12
D16S539	[11]	11	11,(10),[9]	11,11	11,[10]	11,11	9,10	11,11
D2S1338	INC	[19,22]	19,22,[16,21,23]	19,22	21,22,23,[17,19,20]	21,22,23	16,23	19,22
D19S433	[12]	13.2,[12,14.2]	13.2,14.2,(12,14,15.2)	13.2,14.2	12,(13.2,14.2),[13,14]	12,12	14,[15.2]	13.2,14.2
vWA	INC	[16,17,18]	16,17,[18]	16,17	16,17,18	16,17,18	17,18	16,17
TPOX	INC	[8,11]	6,8,11,[9]	6,11	6,8,11	8,11	8,9	6,11
D18S51	INC	[13,16]	13,16,[14,15]	13,16	13,16,[15]	13,16	13,14	13,16
AMEL	[X]	X,[Y]	X,Y	X,Y	X,(Y)	X,X	X,Y	X,Y
D5S818	INC	[11,12,13]	12,13,[11]	11,12,13	8,11,[12,13]	8,11,12,13	11,[13]	12,13
FGA	INC	[19,22,23]	19,22,[21,23,24]	19,22	22,23,[19,24]	19,22,23,24	[21,24]	19,22
CODIS				Forensic Mixture		Forensic Mixture	Suspect Known	Suspect Known

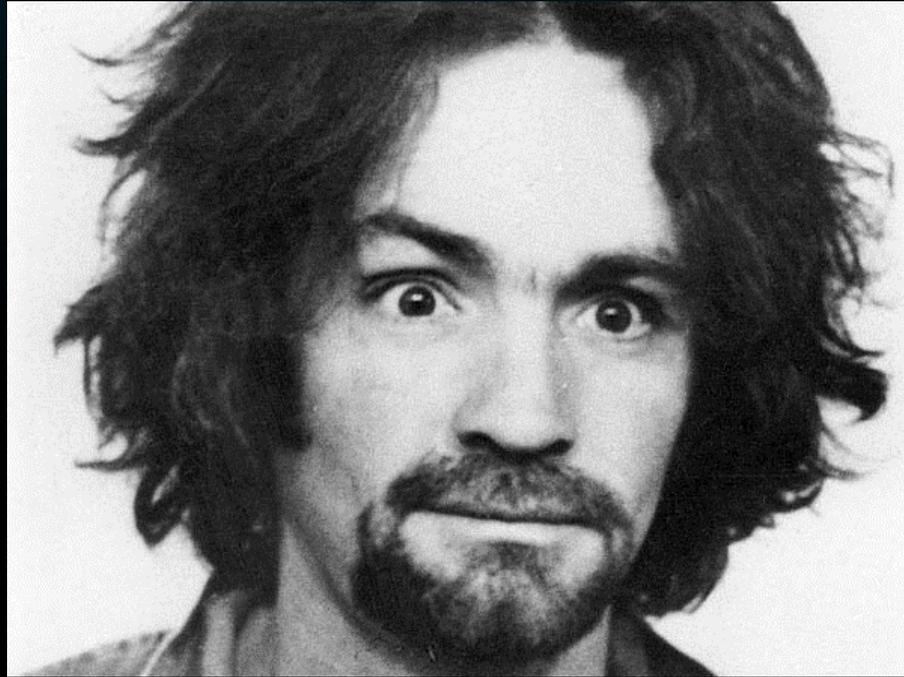


Mixture of at least three individuals.  
Consistent with Barbara Leslie and  
Montez Wright.

88,000,000,000,000 times more likely  
to be Leslie and Wright than a random  
African American male.

1,100,000,000,000,000 times more  
likely to be Leslie and Wright than a  
random Hispanic male.

27,000,000,000,000,000 times more  
likely to be Leslie and Wright than a  
random Caucasian male.



Guilty

Guilty

Guilty

Guilty

Guilty



Guilty

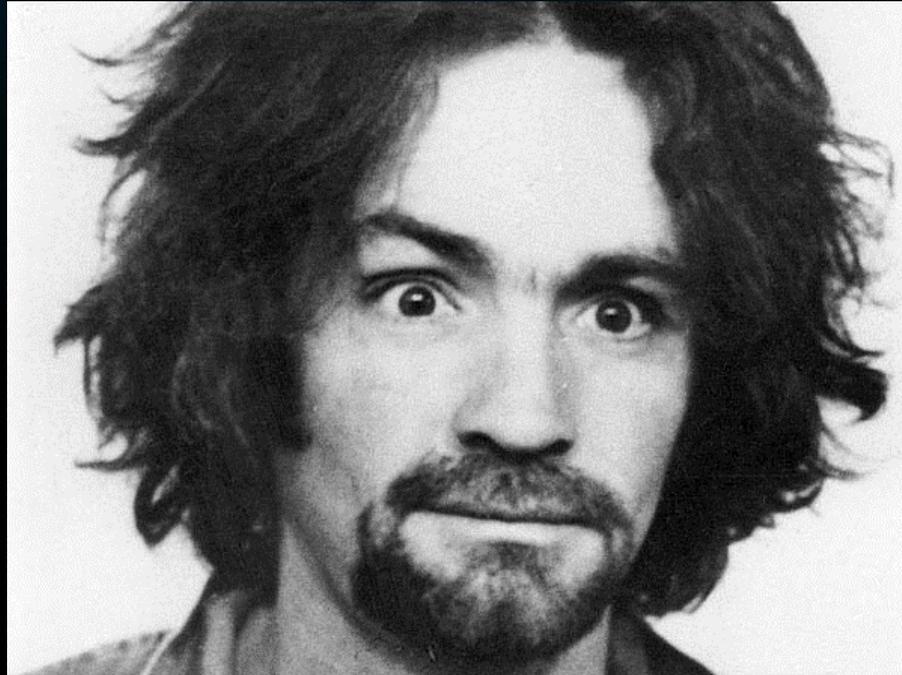
Guilty

Guilty

Guilty



# Guilty



## Legal Issues

- If counsel is going to superimpose commentary to images of trial exhibits, the annotations must, without question, accurately represent the trial evidence.... Moreover, any type of blatant appeal to the jury's emotions or egregious proclamation of a defendant's guilt would plainly be unacceptable....
- People v. Williams, 74 N.E.3d 649, 652 (N.Y. 2017)

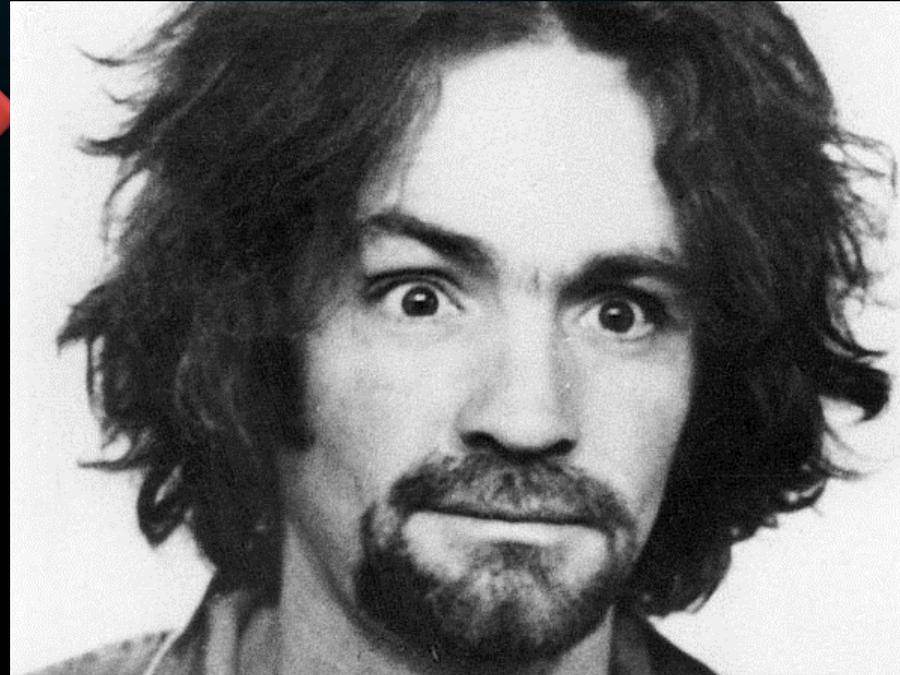
## Legal Issues

- The state's modification of the photograph by adding the red, block letters with the word “GUILTY” and superimposing it across Walter's face clearly altered the form of the admitted evidence. As altered, this photograph would not have been admissible evidence.
- State v. Walter, 479 S.W.3d 118, 125 (Mo. 2016)

## Legal Issues

- A PowerPoint may not be used to make an argument visually that could not be made orally.... the display of Williams's bloody body with the words “Terror,” “Fear,” and “MURDER” in red lettering served no purpose other than to attempt to inflame the jury.
- Spence v. State, 129 A.3d 212, 223 (Del. 2015)

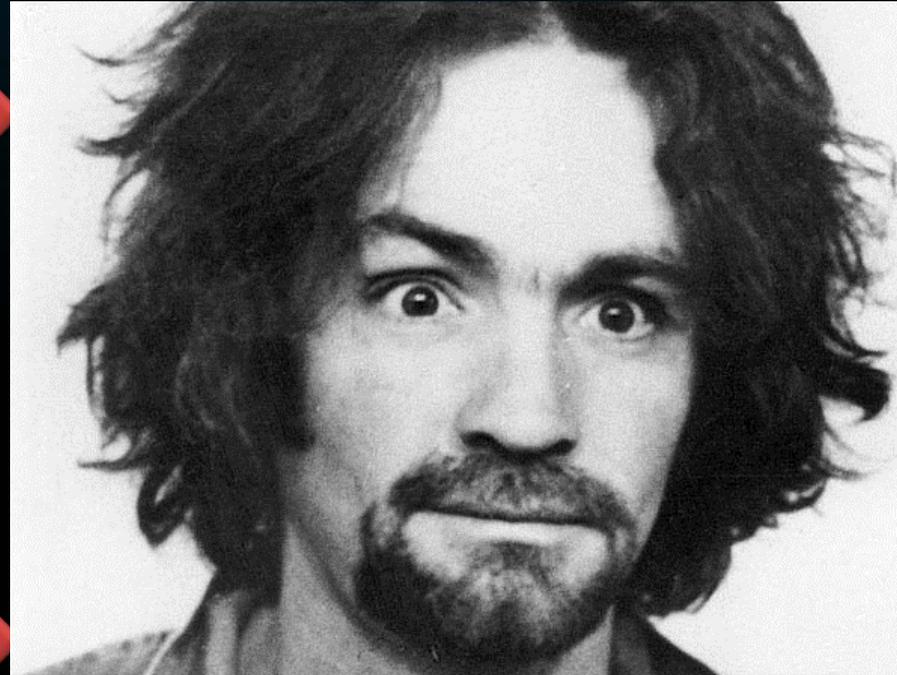
DNA  
evidence  
puts him at  
the scene



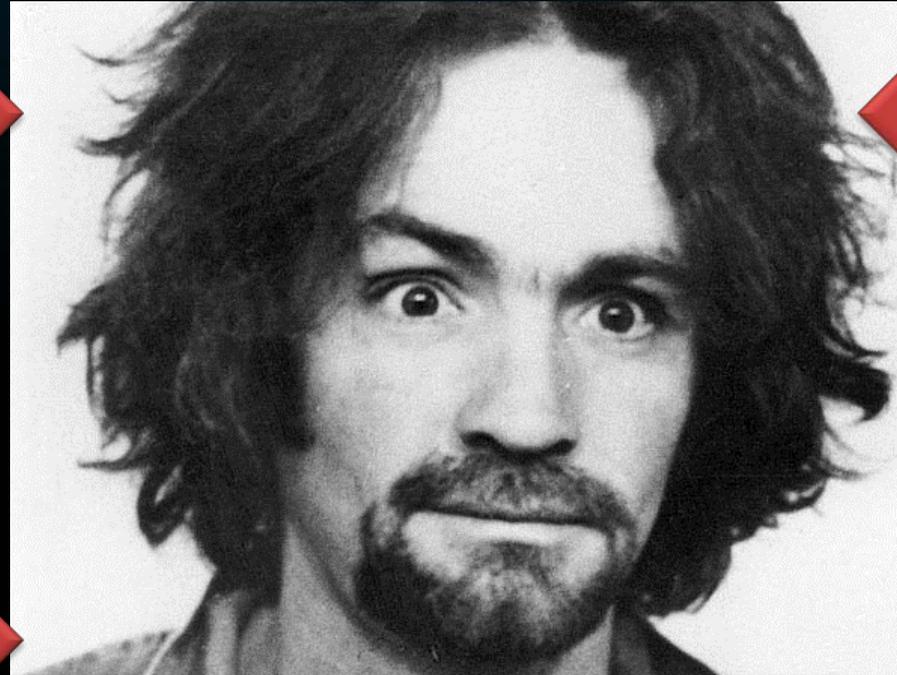
the scene

DNA  
evidence  
puts him at  
the scene

Fingerprints  
on the  
murder  
weapon



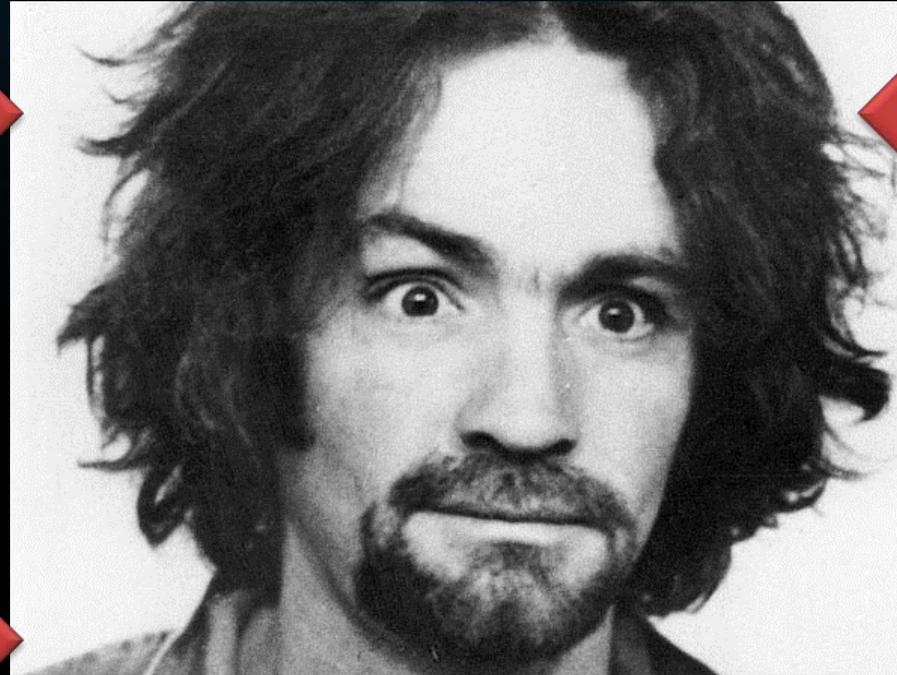
DNA  
evidence  
puts him at  
the scene



He confessed

Fingerprints  
on the  
murder  
weapon

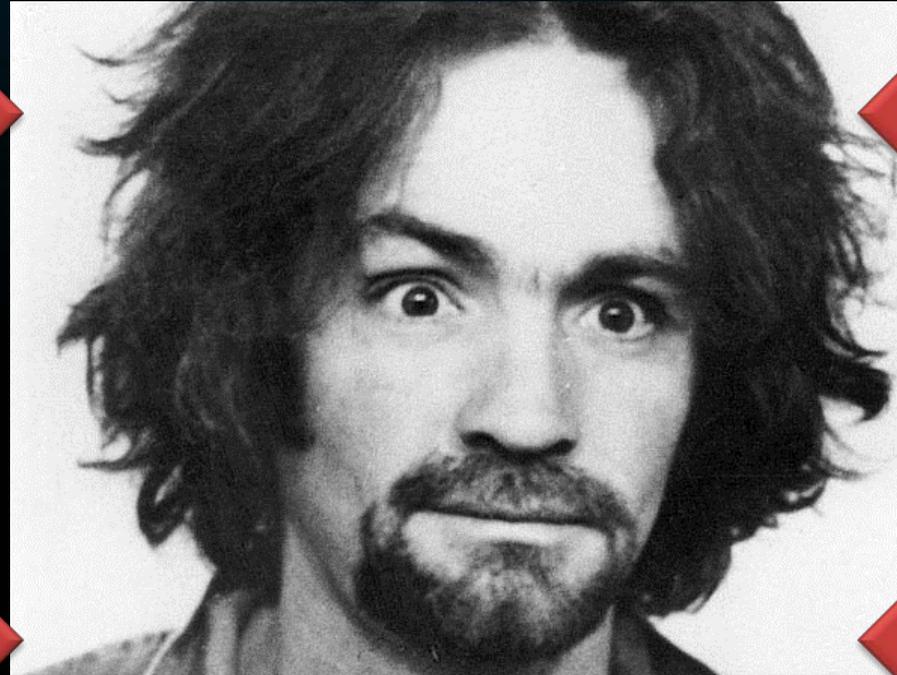
DNA  
evidence  
puts him at  
the scene



He confessed

Fingerprints  
on the  
murder  
weapon

DNA  
evidence  
puts him at  
the scene

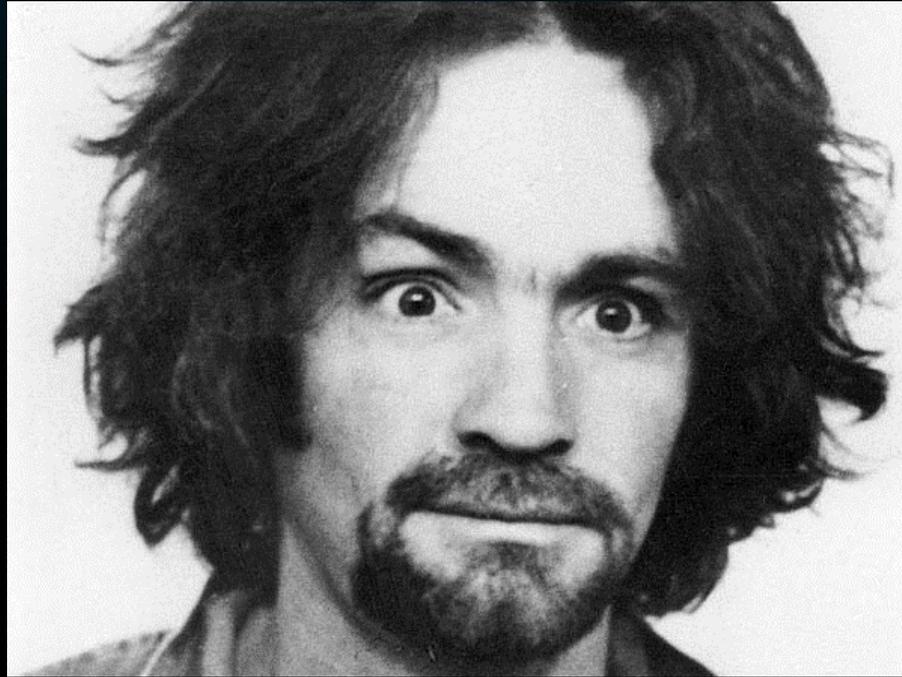


He confessed

Fingerprints  
on the  
murder  
weapon

There's LOTS  
of 404(b)  
evidence

# Guilty



### 3. The PowerPoint's Assertion that the Defendant is Guilty

[21] [22] Spence's third untimely objection was to slide 066, which includes the following statement: “*The defendant is guilty of all the charges against him[.]*”<sup>59</sup>

We agree that the statement contained in slide 066 was improper. While the State asserts that the statement appeared at the end of a series of slides in which it set forth its arguments for each offense, the State should have included a qualifier before its statement, such as, for example, “the evidence demonstrates.”

The evidence shows he is

Guilty

Guilty

Guilty

Guilty

Guilty



Guilty

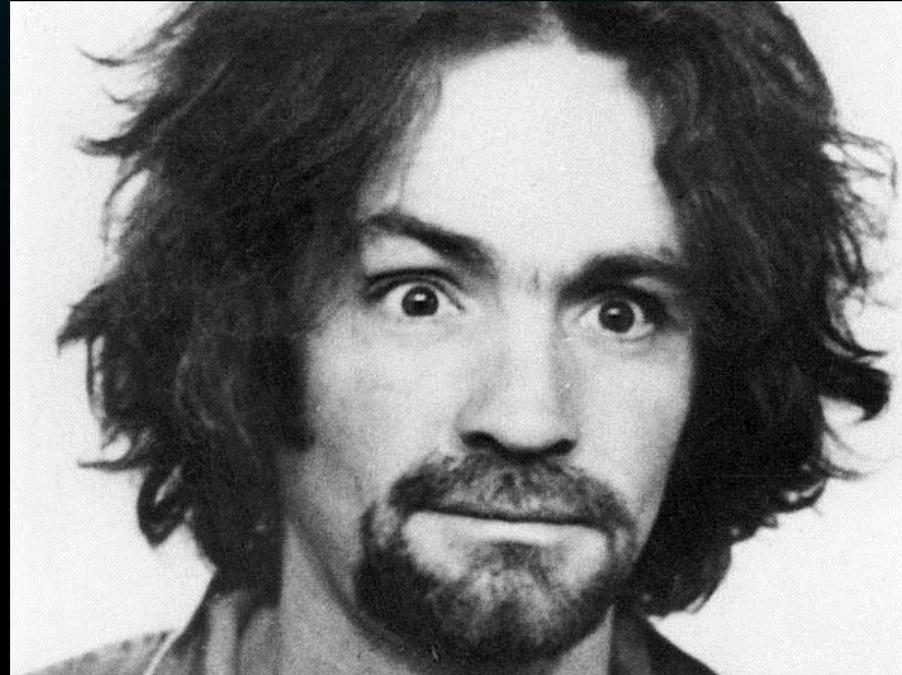
Guilty

Guilty

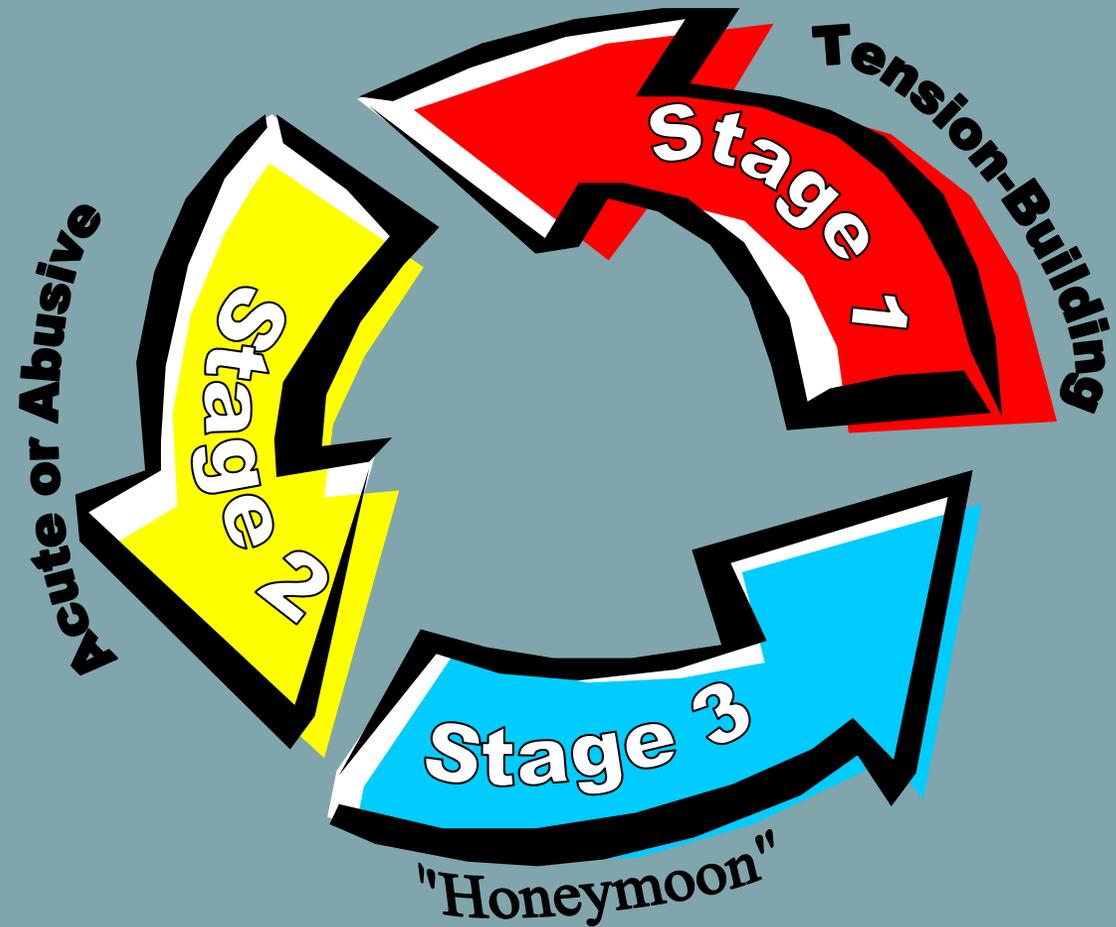
Guilty



The evidence shows he is Guilty



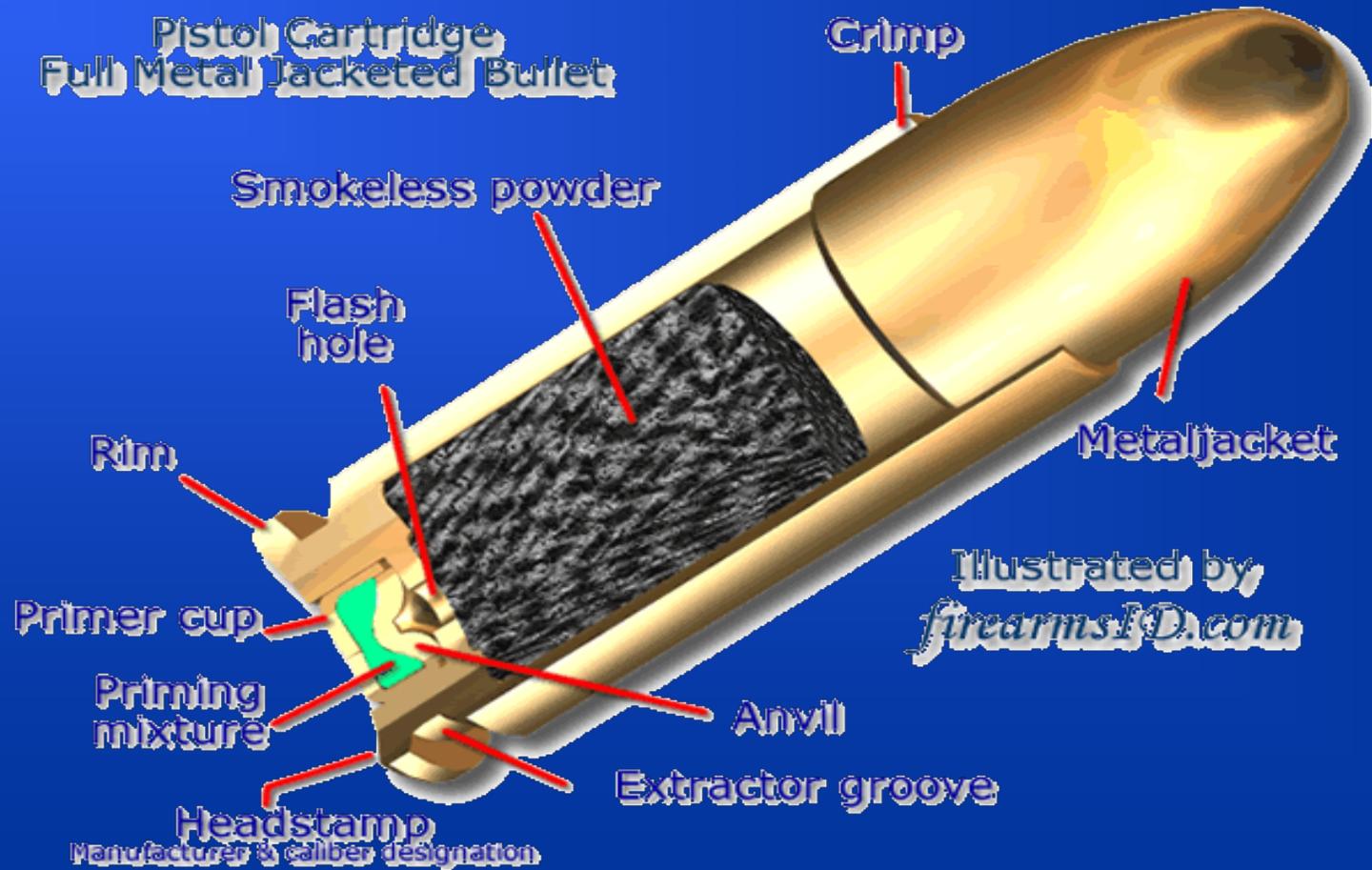
# Cycle of Abuse



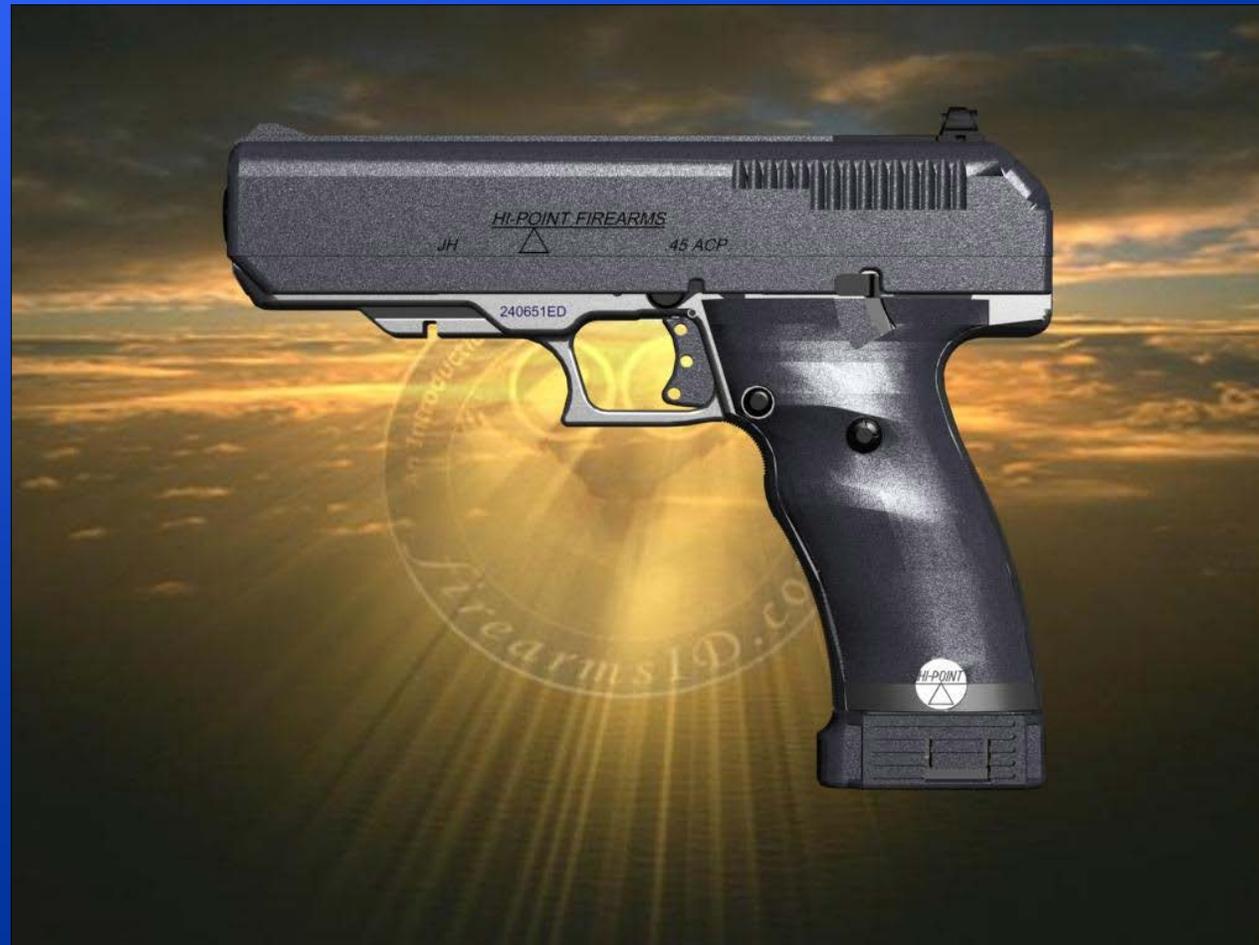
# Power and Control Wheel



# Pistol Cartridge



# Pistol Operation



# Pistol Operation



# Pistol Operation



# Pistol Operation



# Pistol Operation



# Pistol Operation



# Pistol Operation



# Pistol Operation



# Pistol Operation



# Rebut Defense Themes

- Order transcripts?
- Create binder exhibits?
- Bring words and documents to life

**State v. Allyn Smith  
CR 2015-106788**



**Gilford Curley**

- Named as father of Khi'yah? 

- Named as father of Khi'yah? 
- Bought a gun before the murder? 

- Named as father of Khi'yah? 
- Bought a gun before the murder? 
- Blocked number? 

- Named as father of Khi'yah? 
- Bought a gun before the murder? 
- Blocked number? 
- Set up meeting on Facebook? 

- Named as father of Khi'yah? 
- Bought a gun before the murder? 
- Blocked number? 
- Set up meeting on Facebook? 
- Delete on Facebook? 

- Named as father of Khi'yah? 
- Bought a gun before the murder? 
- Blocked number? 
- Set up meeting on Facebook? 
- Delete on Facebook? 
- Cell phone at apartment? 

- Named as father of Khi'yah? 
- Bought a gun before the murder? 
- Blocked number? 
- Set up meeting on Facebook? 
- Delete on Facebook? 
- Cell phone at apartment? 
- Cell phone at murder scene? 

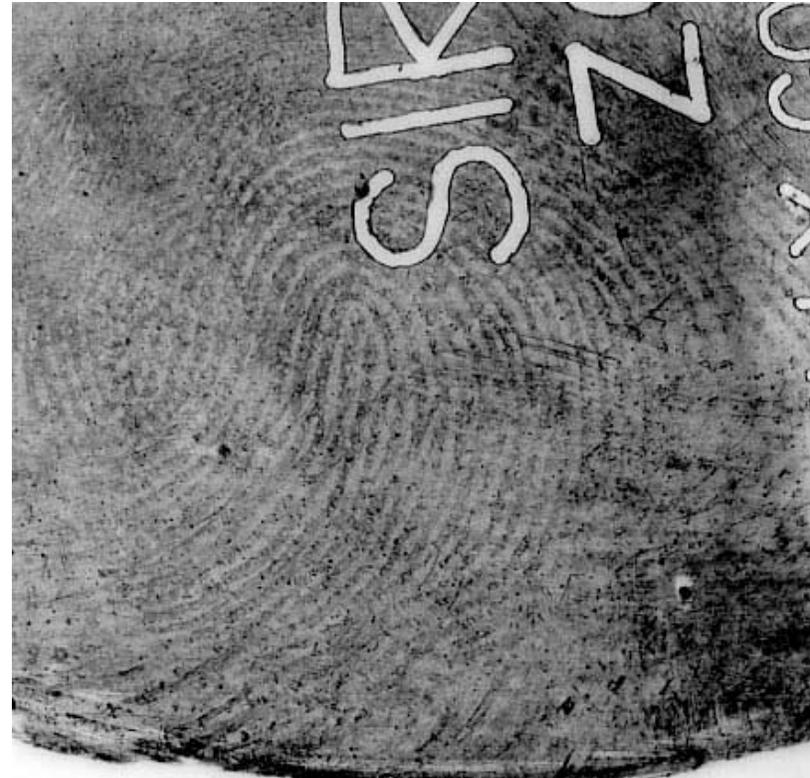
	Gilford Curley	Robert Marley	
Named as father of Khi'yah?			
Bought a gun before the murder?			
Blocked number?			
Set up meeting on Facebook?			
Delete on Facebook?			
Cell phone at apartment?			
Cell phone at murder scene?			

# Latent Comparison

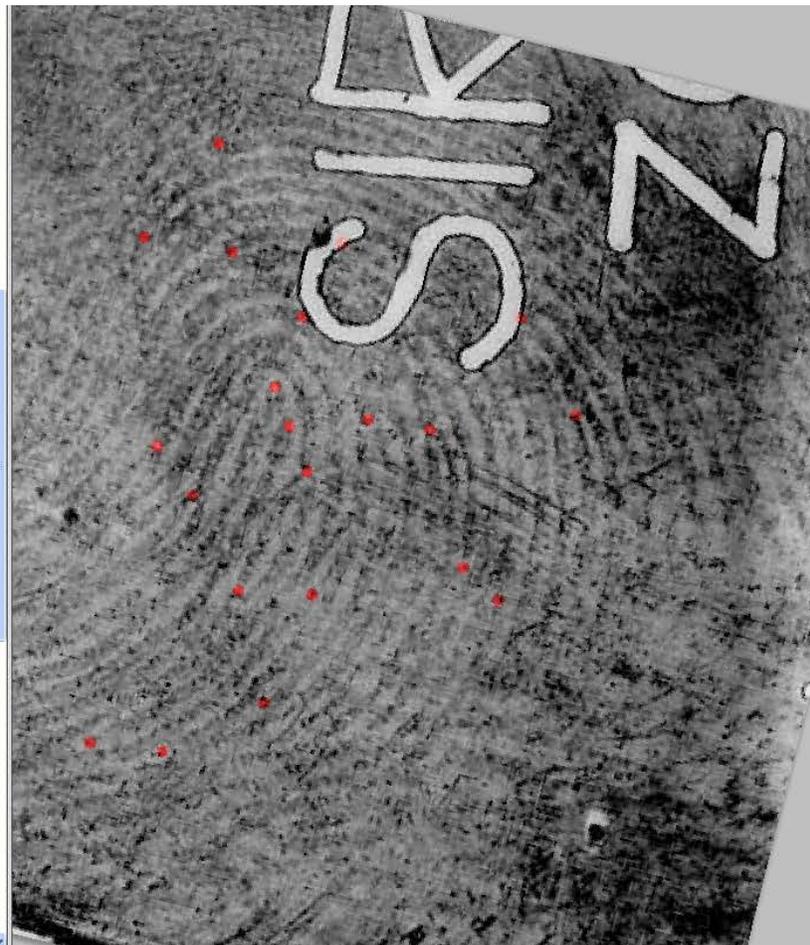
**Known fingerprint of Defendant**



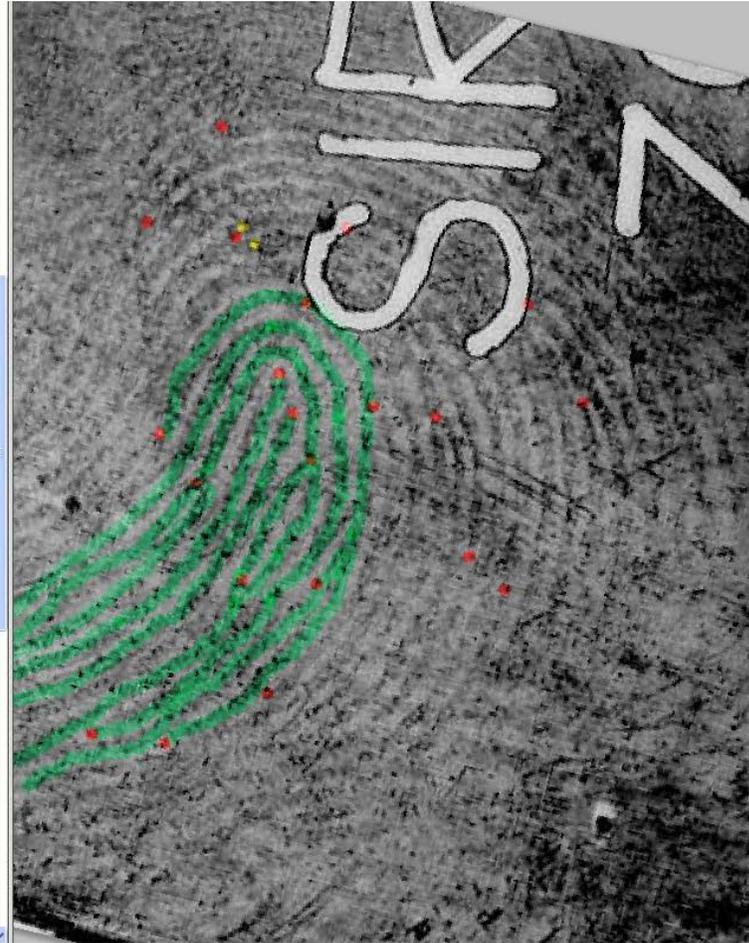
**Latent print on item #17538**



# Minutiae

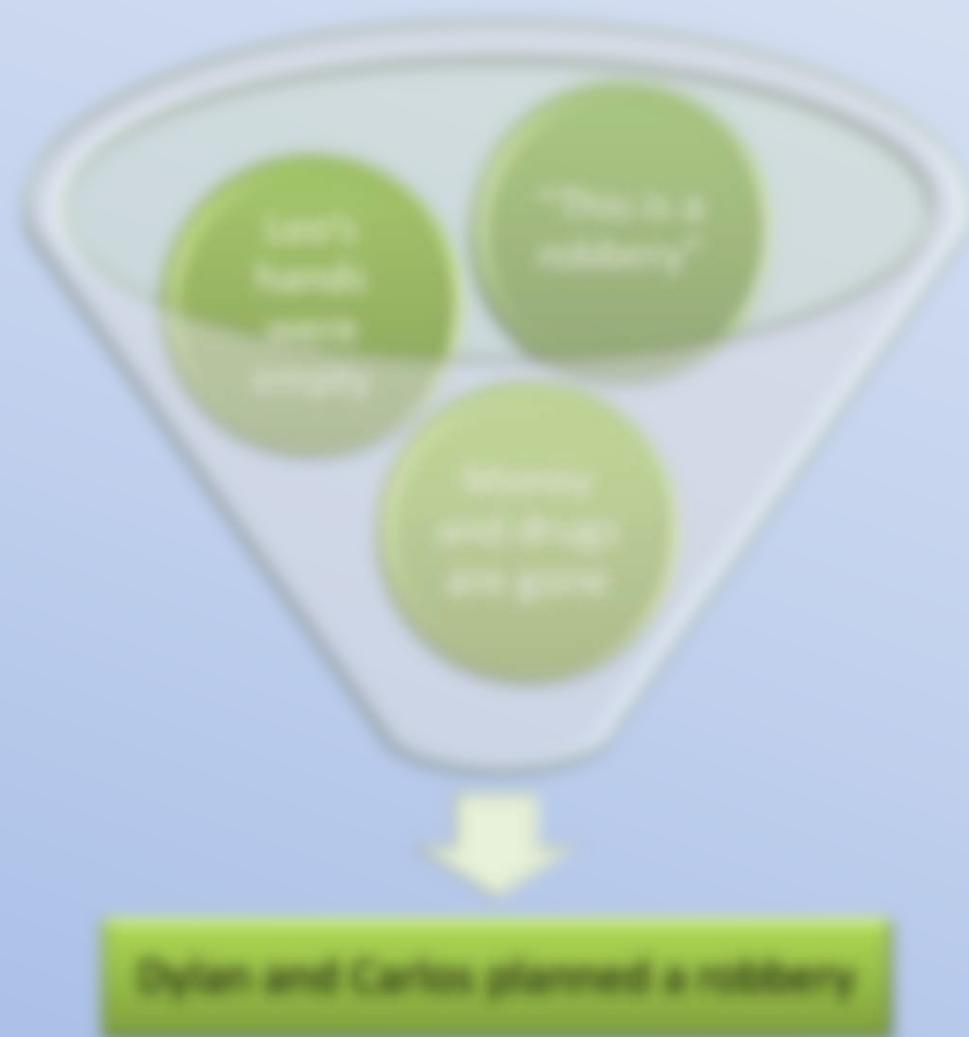


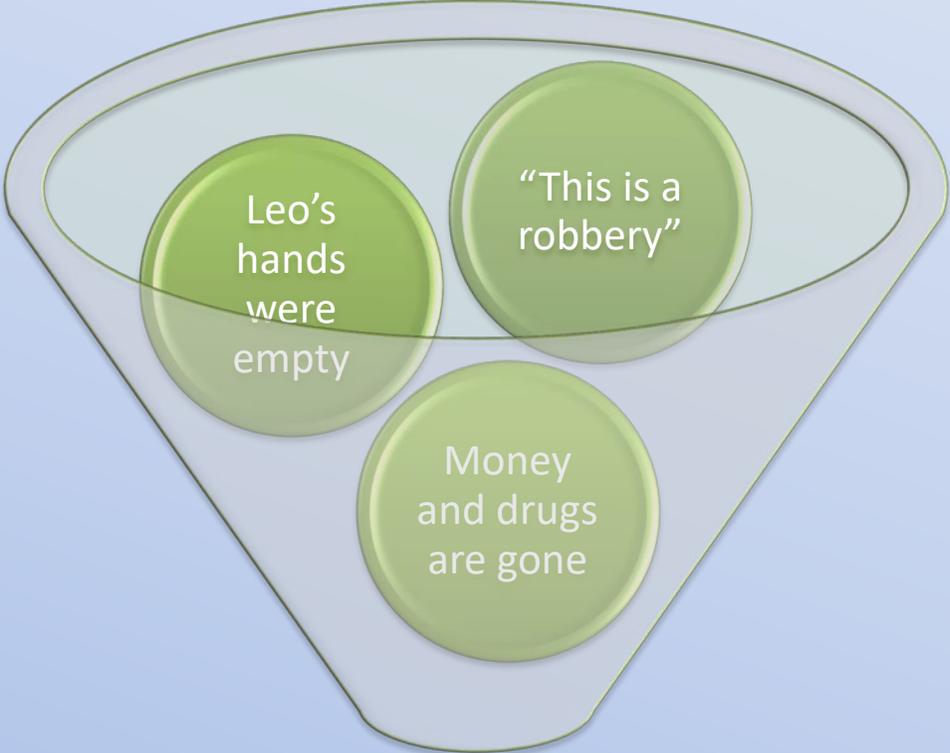
# Ridge Flow



Who chose the witnesses?







Dylan and Carlos planned a robbery

Account 1 – brownmia14@yahoo.com

1. Account Name – brownmia14@yahoo.com
2. Date Account Submitted – 02/07/2016
3. Location of Account Creation – 66.87.70.210 (Phoenix, Arizona, United States)
4. Account Status – This account as rejected on 2/08/2016
5. Legal Business Name (if given) – LUSCIOUSLOCZ
6. DBA (if given) – LUSCIOUSLOCZ
7. URL – <http://lusciouslocz.bigcartel.com>
8. Product Description – “Virgin hair”
9. Volume / # of Charges - \$26,295 / 5
10. Email Address – brownmia14@yahoo.com
11. Phone Number - 2487226520
12. Company Representative / DOB – Tichina Shepard / 10/07/1992
13. Physical Address – 123 Creekside Court, GA, AZ, 30223, US
14. Bank Account(s) –

February

2016

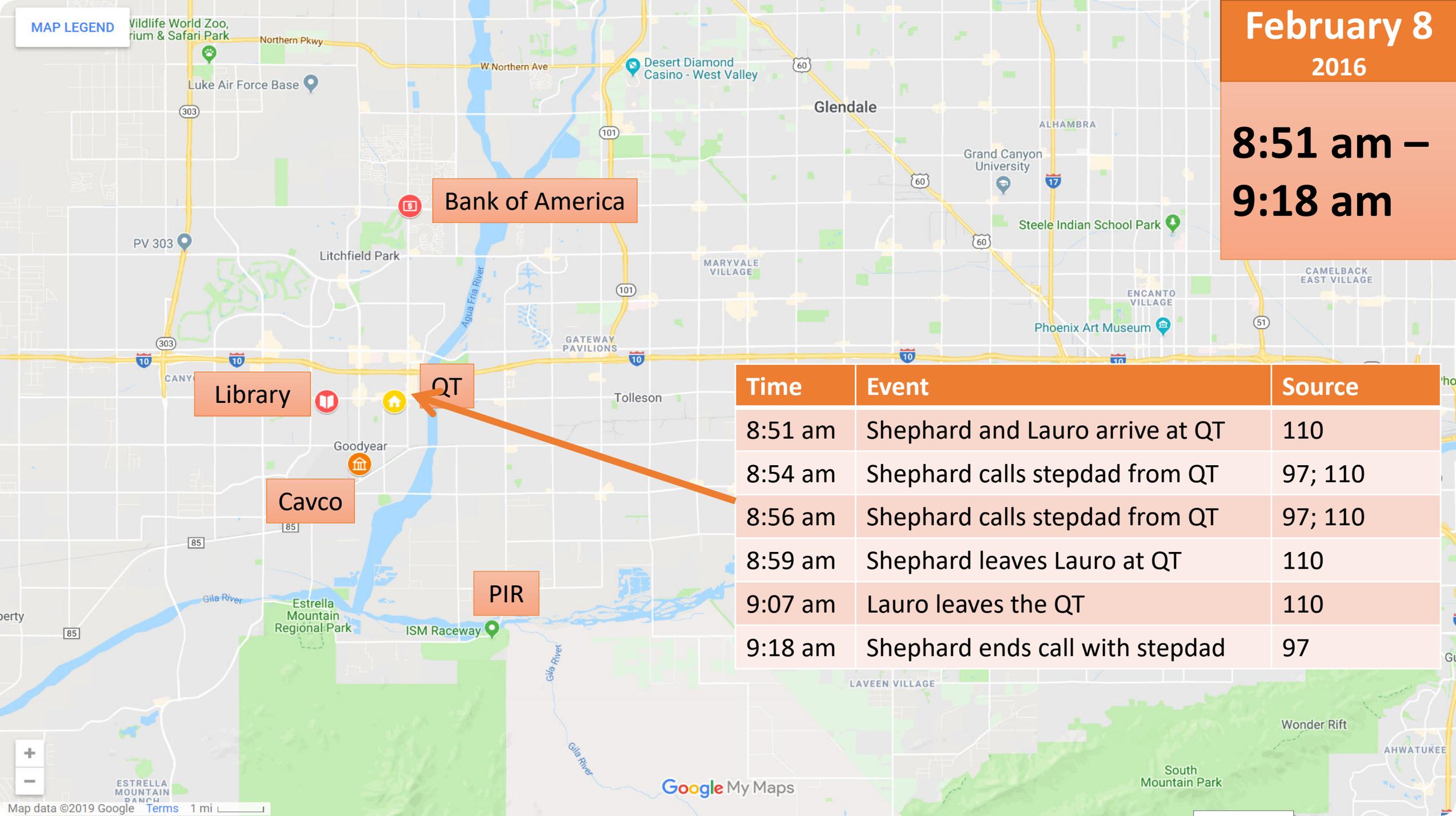
Sunday

7

Exhibit  
93

<b>Login IP</b>	<b>Location</b>	<b>First seen</b>	<b>Last seen</b>
US 208.54.40.179	Detroit, MI, United States	2/14/2016 0:18	2/14/2016 0:26
US 66.87.71.119	Phoenix, AZ, United States	2/10/2016 19:48	2/10/2016 19:50
US 66.87.71.140	Phoenix, AZ, United States	2/9/2016 22:39	2/9/2016 22:39
US 66.87.71.252	Phoenix, AZ, United States	2/9/2016 13:48	2/9/2016 19:14
US 70.167.209.19	Phoenix, AZ, United States	2/9/2016 2:07	2/9/2016 13:29
US 66.87.69.9	, AZ, United States	2/8/2016 22:06	2/9/2016 2:04
US 209.180.130.202	Gilbert, AZ, United States	2/8/2016 20:25	2/8/2016 20:53
US 66.87.71.107	Phoenix, AZ, United States	2/8/2016 18:31	2/8/2016 18:32
US 66.87.71.44	Phoenix, AZ, United States	2/8/2016 17:42	2/8/2016 17:47
US 66.87.70.112	Phoenix, AZ, United States	2/8/2016 16:58	2/8/2016 17:02
US 66.87.70.210	Phoenix, AZ, United States	2/7/2016 20:03	2/7/2016 21:19

8:51 am –  
9:18 am



Time	Event	Source
8:51 am	Shephard and Lauro arrive at QT	110
8:54 am	Shephard calls stepdad from QT	97; 110
8:56 am	Shephard calls stepdad from QT	97; 110
8:59 am	Shephard leaves Lauro at QT	110
9:07 am	Lauro leaves the QT	110
9:18 am	Shephard ends call with stepdad	97



I'll plead guilty if you don't let  
Mosher talk again



“Stripe – between 8:45 and 9:00  
while Ms. Shephard was at QT”

<b>Login IP</b>	<b>Location</b>	<b>First seen</b>	<b>Last seen</b>
US 208.54.40.179	Detroit, MI, United States	2/14/2016 0:18	2/14/2016 0:26
US 66.87.71.119	Phoenix, AZ, United States	2/10/2016 19:48	2/10/2016 19:50
US 66.87.71.140	Phoenix, AZ, United States	2/9/2016 22:39	2/9/2016 22:39
US 66.87.71.252	Phoenix, AZ, United States	2/9/2016 13:48	2/9/2016 19:14
US 70.167.209.19	Phoenix, AZ, United States	2/9/2016 2:07	2/9/2016 13:29
US 66.87.69.9	, AZ, United States	2/8/2016 22:06	2/9/2016 2:04
US 209.180.130.202	Gilbert, AZ, United States	2/8/2016 20:25	2/8/2016 20:53
US 66.87.71.107	Phoenix, AZ, United States	2/8/2016 18:31	2/8/2016 18:32
US 66.87.71.44	Phoenix, AZ, United States	2/8/2016 17:42	2/8/2016 17:47
US 66.87.70.112	Phoenix, AZ, United States	2/8/2016 16:58	2/8/2016 17:02
US 66.87.70.210	Phoenix, AZ, United States	2/7/2016 20:03	2/7/2016 21:19

# Legal Issues

- Always make a record
  - This is harder than you think
  - Orientation does double duty
- Exhibit numbers on all exhibits
- Admit slides for purposes of appeal
- Show slides to counsel in advance

# The Big Picture

- Focus on admitted exhibits
  - If you need in close, admit in trial!
- Be rigorous about the record
- Don't push the limits

# The Big Picture

- Don't get too involved in your tech
  - Remember “blocking”
- Make the tech an extension of you
- Offer to share/play nice

Thank you



jadyb  
@bwayhrvy



u ever think about how the year 3000  
is literally 81 years away

↑ Vote ↓

1

Share



BEST COMMENTS

eden\_refael • 4m

We're all in 2019 while this guy's living in 2919



Reply

3

