

40TH ANNUAL

Colorado Case Problem

*The People of the State of Colorado
vs. Karen Snow*

Written by the Colorado Bar Association Mock
Trial Committee



coloradohighschoolmocktrial.com

CASE SUMMARY

Karen Snow is accused of hitting and killing her boyfriend with her SUV and leaving him to die in the snow. There is evidence that supports that, and the lead detective claims Karen Snow admitted to hitting him. However, a defense witness claims Karen Snow didn't proclaim "I hit him! I hit him!" but was incredulously asking the detective "I hit him? I hit him?" Moreover, there is other evidence that the victim, a police officer, was beaten up in a fight at a police sergeant's house and was dragged outside and left to freeze in the snow—and even evidence that someone at the house that night searched "how long to die in the cold" before the victim's body was ever found.

AVAILABLE WITNESSES

Prosecution

1. Kai Morrison
2. Detective Jordan Mankiewicz
3. Chase Melvin

Defense

1. London Holt
2. Adrian Canning
3. Nevada Morales

EXHIBITS

Exhibit 1 – Kai's phone search history

Exhibit 2 – Coroner's report

Exhibit 3 – Karen and John text exchange

Exhibit 4 – Mankiewicz group text exchange

Exhibit 5 – Agent Jay temporary suspension notice

Exhibit 6 – Chase Melvin's CV

Exhibit 7 – Vehicle software logging from Karen's vehicle

Exhibit 8 – Karen's call log

Exhibit 9 – London Holt's CV

Exhibit 10 – Wi-Fi tracking from Stone residence

Exhibit 11 – Nevada Morales's CV

Exhibit 12 – Strip and grid method searching

STIPULATED FACTS

1. The Case Summary is not a part of the case materials, and its contents are not admissible and no reference to the Summary contents may be entered or referenced during the trial.
2. The parties are properly before the Court and jurisdiction and venue are proper.
3. A witness may be portrayed by a team member of any gender.
4. The signatures on all witness statements and documents are authentic and no attorney or witness may attempt to deny the authenticity of the signature.
5. All witnesses are presumed to have knowledge of the facts contained in each of the stipulations.
6. All exhibits included in the problem are authentic and accurate in all respects and no objections to the authenticity of the exhibits will be entertained.
7. Stipulations cannot be contradicted or challenged.
8. It is presumed that the expert witnesses have read each other's reports and have had access and reviewed the same data collected from the vehicle and witness cell phones.

DISTRICT COURT PUEBLO COUNTY, STATE OF COLORADO 501 N. Elizabeth St. Pueblo, CO 81003 (719) 404-8700	▲ COURT USE ONLY ▲
THE PEOPLE OF THE STATE OF COLORADO vs. KAREN SNOW Defendant	
Carmine Accidenti, #12345 10th Judicial District Attorney 701 Court St. Pueblo, CO 81003 Phone: (719) 583-6030 Fax: (719) 583-6666	Case No: 23CR0050 Courtroom: 501
COMPLAINT AND INFORMATION	

Carmine Accidenti, District Attorney for the Tenth Judicial District, of the State of Colorado, in the name and by the authority of the People of the State of Colorado, informs the court of the following offenses committed, or triable, in the County of Pueblo:

COUNT 1: MURDER IN THE FIRST DEGREE (F1)

On or about February 11, 2023, KAREN SNOW unlawfully, feloniously, and after deliberation with the intent to cause the death of another person, caused the death of JOHN MURPHY, in violation of section 18-3-102(1)(a), C.R.S.

By:

Carmine Accidenti

Deputy District Attorney

Filed on: February 28, 2023.

DISTRICT COURT PUEBLO COUNTY, COLORADO 501 N. Elizabeth St. Pueblo, Colorado 81003	
THE PEOPLE OF THE STATE OF COLORADO Plaintiff v. KAREN SNOW Defendant	<p style="text-align: center;">▲ COURT USE ONLY ▲</p> Case Number: 2023CR0050 Courtroom: 501
JURY VERDICT	

I.* We, the jury, find the Defendant, KAREN SNOW, **NOT GUILTY** of Murder in the First Degree, and the lesser included offense of Murder in the Second Degree, against John Murphy.

Foreperson

II.* We, the jury, find the Defendant, KAREN SNOW, **GUILTY** of:

** Murder in the First Degree against John Murphy

** Murder in the Second Degree against John Murphy

Foreperson

*The Foreperson should sign only one of the above (I. or II.). If the verdict is NOT GUILTY, then I. above should be signed. If the verdict is GUILTY, then II. above should be signed.

**If you find the Defendant Guilty of the crime charged or a lesser included offense, the Foreperson must complete the GUILTY verdict by placing, in ink, an "X" in the appropriate square. ONLY ONE square may be filled in with the remainder to remain unmarked.

JURY INSTRUCTIONS

Instruction No. 1

The charges against the Defendant are not evidence. The charges against the Defendant are only accusations. The fact that the Defendant has been accused is not evidence that the Defendant committed any crime.

The Defendant, Karen Snow, is charged with committing the crimes of Murder in the First Degree (After Deliberation), Murder in the Second Degree, and Vehicular Homicide (Under the Influence of Alcohol and/or Drugs) on or about February 11, 2023, in Pueblo, Colorado. The Defendant has pleaded not guilty.

Instruction No. 2

Every person charged with a crime is presumed innocent. This presumption of innocence remains with the Defendant throughout the trial and should be given effect by you unless, after considering all the evidence, you are then convinced that the Defendant is guilty beyond a reasonable doubt.

The burden of proof is upon the prosecution to prove to the satisfaction of the jury beyond a reasonable doubt the existence of all of the elements necessary to constitute the crime charged.

Reasonable doubt means a doubt based upon reason and common sense which arises from a fair and rational consideration of all the evidence, or the lack of evidence, in the case. It is a doubt which is not vague, speculative, or imaginary, but such a doubt as would cause reasonable people to hesitate to act in matters of importance to themselves.

If you find from the evidence that each and every element of a crime has been proven beyond a reasonable doubt, you should find the Defendant guilty of that crime. If you find from the evidence that the prosecution has failed to prove any one or more of the elements of a crime beyond a reasonable doubt, you should find the Defendant not guilty of that crime.

Instruction No. 3

A fact may be proven by either direct or circumstantial evidence. Under the law, both are acceptable ways to prove something. Neither is necessarily more reliable than the other.

Direct evidence is based on first-hand observation of the fact in question. For example, a witness's testimony that she looked out a window and saw snow falling might be offered as direct evidence that it was snowing.

Circumstantial evidence is indirect. It is based on observations of related facts that may lead you to reach a conclusion about the fact in question. For example, a witness's testimony that she looked out a window and saw snow covering the ground might be offered as circumstantial evidence that it had snowed.

Instruction No. 4

You are the sole judges of the credibility of each witness and the weight to be given to the witness's testimony. You should carefully consider all of the testimony given and the circumstances under which each witness has testified.

For each witness, consider that person's knowledge, motive, state of mind, demeanor, and manner while testifying. Consider the witness's ability to observe, the strength of that person's memory, and how that person obtained his or her knowledge. Consider any relationship the witness may have to either side of the case, and how each witness might be affected by the verdict. Consider how the testimony of the witness is supported or contradicted by other evidence in the case. You should consider all facts and circumstances shown by the evidence when you evaluate each witness's testimony.

You may believe all of the testimony of a witness, part of it, or none of it.

Instruction No. 5

The number of witnesses testifying for or against a certain fact does not, by itself, prove or disprove that fact.

Instruction No. 6

Every defendant has a constitutional right not to testify. The decision not to testify cannot be used as an inference of guilt and cannot prejudice the Defendant. It is not evidence, does not prove anything, and must not be considered for any purpose.

Instruction No. 7

You are not bound by the testimony of witnesses who have testified as experts; the credibility of an expert's testimony is to be considered as that of any other witness. You may believe all of an expert witness's testimony, part of it, or none of it.

The weight you give to the testimony is entirely your decision.

Instruction No. 8

A crime is committed when a defendant has committed a voluntary act prohibited by law, together with a culpable state of mind.

“Voluntary act” means an act performed consciously as a result of effort or determination. Proof of a voluntary act alone is insufficient to prove that the Defendant had the required culpable mental state.

The culpable mental state of mind is as much an element of the crime as the act itself and must be proven beyond a reasonable doubt, either by direct or circumstantial evidence.

In this case, the applicable states of mind are explained below:

A person acts “intentionally,” or “with intent” when their conscious objective is to cause the specific result proscribed by the statute defining the offense. It is immaterial whether or not the result actually occurred.

The term “after deliberation” means not only intentionally but also that the decision to commit the act has been made after the exercise of reflection and judgment concerning the act. An act committed after deliberation is never one which has been committed in a hasty or impulsive manner.

A person acts “knowingly,” with respect to a result of their conduct, when they are aware their conduct is practically certain to cause the result.

Instruction No. 9

The elements of the crime of murder in the first degree (after deliberation) are:

1. That the defendant,
2. in the State of Colorado, at or about the date and place charged,
3. after deliberation, and
4. with the intent,
5. to cause the death of a person other than themselves,
6. caused the death of that person or of another person.

After considering all the evidence, if you decide the prosecution has proven each of the elements beyond a reasonable doubt, you should find the Defendant guilty of murder in the first degree (after deliberation).

After considering all the evidence, if you decide the prosecution has failed to prove any one or more of the elements beyond a reasonable doubt, you should find the Defendant not guilty of murder in the first degree (after deliberation).

Instruction No. 10

If you are not satisfied beyond a reasonable doubt that the defendant is guilty of the offense charged, she may, however, be found guilty of any lesser offense, the commission of which is necessarily included in the offense charged if the evidence is sufficient to establish her guilt of the lesser offense beyond a reasonable doubt.

The offense of murder in the first degree, as charged in the information in this case necessarily includes the lesser offense of murder in the second degree.

The elements of the crime of murder in the second degree are:

1. That the Defendant,
2. in the State of Colorado, at or about the date and place charged,
3. knowingly,
4. caused the death of another person

You should bear in mind that the burden is always upon the prosecution to prove beyond a reasonable doubt each and every element of any lesser-included offense which is necessarily included in any offense charged in the information; the law never imposes upon a defendant in a criminal case the burden of calling any witnesses or producing any evidence.

After considering all the evidence, if you decide that the prosecution has proven each of the elements of the crime charged or of a lesser-included offense, you should find the defendant guilty of the offense proven, and you should so state in your verdict.

After considering all the evidence, if you decide that the prosecution has failed to prove one or more elements of the crime charged and one or more elements of the lesser-included offenses, you should find the defendant not guilty of these offenses, and you should so state in your verdict.

While you may find the defendant not guilty of the crimes charged and the lesser-included offense, you may not find the defendant guilty of more than one of the following offenses:

Murder in the first degree

Murder in the second degree

1 **KAI MORRISON – WITNESS STATEMENT**

2 My name is Kai Morrison. When I was 14, I moved to Colorado with my mom and
3 17-year-old sister Jeanette. It was hard starting a new high school in a new state. I had
4 trouble making new friends and fitting in, but I was lucky because I had my big sister
5 Jeanette looking out for me. Jeanette always treated me like an equal; she never got
6 annoyed when I hung out with her friends or tagged along when they went out. I never
7 felt alone when I was with Jeanette.

8 After Jeanette graduated from High School, she got a job as a dental assistant
9 and that was where she met Phillip Stone. He’s a Sergeant with the Pueblo Police
10 Department. He came in for a teeth cleaning and left with her phone number. He has a
11 killer smile! Jeanette and Phillip have been married for 4 years now and it’s a great
12 marriage. Phillip really loves and supports my sister and he’s like an older brother to
13 me. He taught me how to fish, how to drift in Mario Kart, and he never makes me feel
14 like a third wheel when I’m at their house. I’m super close with Phillip and couldn’t ask
15 for a better brother-in-law.

16 After my High School graduation, I started working as a bartender at a
17 neighborhood restaurant called Madden’s Irish Pub, and I’ve been working there ever
18 since. I like being a bartender, and my manager is really nice. Like, if there’s leftover
19 food in the kitchen at closing time, I can take it home with me which really helps with
20 expenses. I usually bring the food to Jeanette and Phillip’s house so we can have family
21 dinner. Jeanette’s home feels like my home, and Jeanette and Phillip’s friends are my
22 friends.

23 I actually met John Murphy through Phillip. John is also a police officer, and he
24 and Phillip work together in the same division. Before he was murdered, John liked to
25 hang out at Phillip's house on Sundays. They'd watch football, and eat leftover onion
26 rings and fries I brought home from the pub. I joined them as often as I could, and John
27 and I got really close. We talked for hours about football and John used to ask my
28 advice when he was setting up his fantasy football line-up. John stopped asking for my
29 help when Phillip accused him of cheating because I'm that good at fantasy football.

30 I also knew John Murphy's wife, Karen Snow. Karen didn't like football very
31 much. She mostly hung around the house while we watched the games and didn't add
32 much to the social setting. Karen seemed to think that just because I was friends with
33 her husband, I needed to be friends with her too. I didn't think so, but I played along and
34 made small talk with her for John's sake. John really seemed to want us to get along
35 and, like I said, John and I were close, so I was friendly to Karen for him.

36 On Friday, February 10, 2023, I was bartending at Madden's Irish Pub. Phillip
37 was there hanging out with a bunch of colleagues and friends from the Police
38 Department. John Murphy and Karen Snow arrived at the bar together around 10:00
39 p.m. They ordered drinks from me, and I remember John ordered a pint of beer and
40 Karen had a glass of wine. There was another bartender working that night, but I know I
41 only served Karen one glass of wine, and I never saw her drinking anything but that one
42 glass. I'm a bartender, I know drunk when I see it, and Karen definitely wasn't drunk!

43 I was supposed to work the closing shift and shut down the bar at midnight. A
44 few minutes before midnight, I heard Phillip invite the group back to his and Jeanette's
45 house. At that point, a bunch of his cop friends and some other people left the bar to

46 drive over and continue the party at Phillip's house. A few minutes later, a co-worker
47 offered to finish closing for me, so I left the bar to head over to Jeanette and Phillip's
48 house.

49 I headed out to my car and in the parking lot I saw John Murphy and Karen Snow
50 arguing. They were under a light, and I could see John's face was red and his eyes
51 looked swollen, like he was holding back tears. He looked emotional and angry. Karen
52 Snow was talking a lot and pointing in different directions. I didn't get close enough to
53 them to hear what they were saying. I also didn't want to get involved in their private
54 business, so I just kept walking to my car. I got in, turned the car on, turned the lights
55 on, and shifted into reverse. In my rearview mirror, I clearly saw John get into Karen's
56 SUV. I left the parking lot and that was the last time I saw John Murphy alive.

57 The party was already going strong when I got to Phillip and Jeanette's house,
58 and there were even more people than had been at the bar. At one point, I was standing
59 by the living room window, and I saw Karen Stone's SUV pull up to the driveway. I didn't
60 see anyone get out of the SUV. At that point, my inner bartender kicked in and I went
61 into the kitchen to get a drink for John and myself. I came out of the kitchen and looked
62 for John but didn't see him. I walked around the house trying to find him, but he wasn't
63 there, so I eventually drank his drink and mine and stopped looking. I never saw John
64 inside the house that night.

65 One person I definitely remember seeing at the party is an ATF Agent named
66 Edgar Jay. Agent Jay and Phillip worked on a series of cases together a long time ago.
67 It was some big, joint, local-federal task force. The cases wrapped up, but Phillip and
68 Agent Jay stayed friends. Phillip used to say Agent Jay was an honorary Pueblo police

69 officer. Anyway, I remember seeing Agent Jay and feeling nervous because he's a big,
70 muscular man and he has a reputation for getting into fights and physical altercations.
71 Plus, Agent Jay likes to flirt and say inappropriate things. I heard the ATF temporarily
72 suspended him because he lost his temper during an arrest and beat up the suspect.
73 His suspension notice is shown in Exhibit 5. Phillip assured me that Edgar is harmless,
74 and he just has a bit of a temper. What I do know is Phillip and Jeanette's huge German
75 Shepherd Radar seemed to love Edgar. I guess if Phillip and Radar trust Edgar then
76 that should be good enough for me—but I'm still not convinced.

77 I left the party around 1:30 a.m., went home, and tried to fall asleep but I guess I
78 was wired from work and the party. I kept tossing and turning, so around 2:30 a.m. I
79 decided to turn on my phone and mess around on the internet. I remember opening a
80 browser to search something on the web but then I remembered a game I was in the
81 middle of playing on my phone and did that instead. I played the game for a while and
82 then I fell asleep.

83 At 5:00 a.m., I was woken up by a panic call from Karen Snow. She said John
84 didn't come home after the party last night and he wasn't answering his phone. Karen
85 seemed really worried, and she asked me to help her look for John. I was also
86 concerned so I agreed and went outside to wait. A few minutes later, Karen pulled up in
87 her black Lexus SUV and the first words out of her mouth were "What if he's dead?
88 What if a snowplow hit him? I don't remember anything from last night, we drank so
89 much, I don't remember anything."

90 I asked her when she last saw John, and Karen said, "I think I left him at
91 Madden's Pub." I told Karen that didn't make sense because I saw John getting into her

92 Lexus outside the Pub and I saw her Lexus arrive at Phillip and Jeanette's house for the
93 after-party. Karen seemed confused and surprised when I said that and responded, "I
94 don't remember going to the party last night." But then she decided we should go to the
95 house first and see if John was there.

96 During the drive to Phillip and Jeanette's house, Karen was frantically talking and
97 imagining terrible things that could have happened to John. I remember one thing Karen
98 said that was really weird. Karen told me that morning she noticed her Lexus had a
99 cracked taillight and then she said, "What if backed into him with my car? What if I hit
100 him?"

101 As we pulled up to the house, Karen immediately yelled, "I see him!" He was kind
102 of covered by snow, and I didn't see him at all, but somehow Karen knew exactly where
103 he was. She jumped out of the car with the engine still running, ran over to the front
104 yard, and stood over John's body which was lying lifeless in the snow. Karen was crying
105 hysterically and kept repeating "I hit him, I hit him, I hit him." I called 911 and we waited
106 for the police to respond. Karen continued crying and she was shivering uncontrollably.
107 At one point she said, "It's so cold. How long does it take to die from hypothermia?" I
108 took out my phone and searched, "how long to die in the cold" using the same browser
109 tab I'd opened up at 2:30 a.m. My iPhone search history, shown in Exhibit 1, looks like I
110 searched "how long to die in the cold" twice: once at 2:30 a.m. and then again at 6:00
111 a.m. that same day. But that's not accurate. I only searched that question once, at 6:00
112 a.m. I have no idea why it would show a search at 2:30 in the morning, but I am 100%
113 certain that the only thing I did at 2:30 a.m. was open the browser tab. I didn't do any
114 searches, and I didn't delete any searches from my iPhone either.

115 It was super cold that morning, so after calling 911, I went inside the house to
116 warm up. I remember talking to Phillip, Jeanette, and some of Phillip's family who were
117 at the house that morning. Obviously, we talked about the fact that John had been killed
118 but none of us knew how it happened. I remember going in and out of the house several
119 times that day to warm up.

120 I remember that, at some point, I went outside and spoke to the Detective,
121 Jordan Mankiewicz, who showed up to handle the scene. I know Jordan because I'm
122 good friends with Jordan's sister. I gave Jordan my statement and told Jordan what I
123 saw the night before. Later in the day, after I warmed up and after re-telling my account
124 to several people in the house, I remembered the odd things Karen Snow said on the
125 drive over that morning. So, I went back outside and asked Detective Mankiewicz to let
126 me amend my statement. Jordan said I could make changes, so I told Jordan about the
127 statements Karen made during the drive over. The next day, I went into the police
128 station, gave a formal interview, and I told Jordan it was Karen Snow who asked me to
129 search how long it takes for someone to die from hypothermia.

130 I have carefully reviewed this statement. It is true and accurate, and it includes
131 everything I know that could be relevant to the events I discussed. I understand that I
132 can and must update this statement if anything new occurs to me before the trial.

133 By: Kai Morrison

134 Kai Morrison

1 **DETECTIVE JORDAN MANKIEWICZ – WITNESS STATEMENT**

2 My name is Jordan Mankiewicz, and I am a detective for the Pueblo County
3 Sheriff's Department. I have worked in law enforcement for about five or six years, and
4 I've been with the Pueblo County Sheriff for about three years now. I bounced around a
5 bit before I started in this county. None of my other jobs have been the right fit.

6 Early in the morning on February 11, 2023. I was brought on as the lead
7 detective to investigate the Murphy murder. The Pueblo PD called in the Sheriff's
8 Department because Murphy was a Pueblo PD officer. I'm not sure whether that was
9 necessary or not, but that is how I became involved in the case. I had heard of Officer
10 Murphy before this case, but we weren't close or anything like that. I had definitely
11 heard of Karen Snow before—she is well-known by the law enforcement community.
12 She had a postgraduate degree and, apparently, she always made a point of
13 mentioning that when she talked to anyone with whom her husband worked. More than
14 one cop has said to me that Karen Snow thought she was better than everybody else.

15 I got the call on the morning of the murder and showed up to the scene around
16 11:00 a.m. There were already some other police officers and sheriff deputies on scene,
17 as well as some other witnesses, so I started my investigation by interviewing them.
18 That morning, I took statements from Kai Morrison, Sgt. Phillip Stone, and a few other
19 witnesses. Their statements are all in the report I wrote later that day. I talked to Kai
20 Morrison first. Morrison is a bartender but is related to Sgt. Stone somehow—I think Sgt.
21 Stone is Morrison's brother-in-law. Morrison was also good friends with the victim.

22 Morrison was at the party at Sgt. Stone's home but had also been tending the bar
23 the group had been at earlier in the evening. Morrison was able to tell me about what

24 happened at the bar and things that happened later at Sgt. Stone's home. What
25 interested me the most though was to learn from Morrison that the defendant called
26 Morrison in a panic around 5:00 a.m. because her boyfriend, the victim—John Murphy,
27 hadn't come home and wasn't picking up his phone. Morrison agreed to go out looking
28 for Murphy and the defendant picked up Morrison in a black Lexus SUV. Morrison said
29 when they were in the car together, the defendant said she didn't remember anything
30 from the night before. I was immediately suspicious about that because Morrison had
31 only served the defendant a single glass of wine back at the bar. I let Morrison go into
32 Sgt. Stone's house at that point because it was freezing cold that morning.

33 Then I talked with Sgt. Stone, briefly outside of his house. Sgt. Stone is a good
34 guy. He's well-respected in the law enforcement community along with his son, who is
35 also a Pueblo Sheriff's Deputy. I recently worked on a case with Sgt. Stone's son, and
36 we've gotten beers together a few times too. In fact, we've done that a few times after I
37 was placed on leave. In my opinion, Sgt. Stone's son is a pretty decent guy and a great
38 cop, who reflects well on his family.

39 Sgt. Stone basically confirmed everything Morrison had just told me; however, it
40 wasn't anything new that I didn't already get from Kai Morrison. I determined that he
41 didn't have any information that was valuable to the investigation, so we didn't speak for
42 long. I guess the only thing he mentioned that I hadn't learned from Morrison was that
43 the defendant and victim had been arguing earlier that night at a pub before the party at
44 the Stone's house.

45 While I was talking to Sgt. Stone, Kai Morrison came back outside and wanted to
46 add something to their statement. Morrison told me that in the car on the way to Sgt.

47 Stone's house that morning, the defendant said something like, "could I have hit him?"
48 and "did I hit him?" Also, since the defendant had contacted Morrison by phone that
49 morning, I asked to take Morrison's phone so that we could download any text
50 messages or call logs. Morrison agreed but advised me the defendant asked them to
51 look up how long it takes to die from hypothermia that morning and that the search
52 might be on the phone.

53 With that information I went and spoke with the defendant, Karen Snow. I
54 confronted her with what Morrison said about her admitting to hitting the victim with her
55 car and she immediately broke down and confessed. She said, "I hit him. I hit him. I hit
56 him." At that point I placed the defendant under arrest and had her transported to the
57 detention center. That was when I noticed the defendant's black Lexus SUV had a
58 broken taillight, so I had it towed and impounded.

59 I started looking around the scene of the murder and I noticed there was some
60 blood spatter in the snow. I didn't have my evidence collection kit on me that morning,
61 so Sgt. Stone was gracious enough to give me some red plastic cups to collect the
62 blood. It had snowed that night, so I figured most of the evidence of the murder would
63 be under the top layer of snow. Once I got back from the impound, at around 11:30
64 a.m., I borrowed Sgt. Stone's leaf blower and started clearing away the snow. That's
65 when I saw broken taillight pieces right around where the body was found. I borrowed
66 some plastic baggies from Sgt. Stone and collected the taillight pieces as evidence. I
67 know my report says 1730, but that is just a typo.

68 While red plastic cups and sandwich baggies are not traditional forensic tools
69 that you see on Law and Order or some other fictional show, these tools are perfectly

70 capable of collecting and preserving evidence and, in the real world, you gotta do what
71 you gotta do to solve crimes and put criminals behind bars.

72 I already had a confession, a murder weapon, and some corroborating evidence,
73 so I didn't feel it was necessary to check out the inside of Sgt. Stone's house. Plus,
74 none of the evidence pointed to the Stones as having any involvement in the murder,
75 and they were also being so helpful by lending me all of their household supplies for my
76 investigation.

77 After I collected the pieces of the defendant's taillight, I headed over to the
78 coroner's office to see if we had an initial cause of death. The coroner gave me a copy
79 of the preliminary report she prepared as part of her duties as county coroner. The
80 report I saw is Exhibit 2. The cause of death in this preliminary report was blunt force
81 trauma to the skull—this made perfect sense to me based on my investigation.

82 I went to talk to the defendant again. I wanted to grab a DNA sample from her
83 and ask her some more questions about what happened leading up to her hitting the
84 victim and to confirm what I pretty much already knew. I conducted my interrogation in
85 an interview room at the station. The rooms are equipped for audio and video recording,
86 and I was sure I activated the recording, but I later found out that I must not have
87 switched the equipment on correctly because there was no recording. The interrogation,
88 however, was not that long, and I made notes immediately afterward of the important
89 things the defendant said. At first, the defendant told me that the night before she and
90 the victim went to Madden's Irish Pub where they drank too much. She said that
91 everyone was going to Sgt. Stone's house, but she was tired and wanted to go home
92 instead. I asked her if they argued at all about going to the party, and she denied it. She

93 was really adamant that they had a “great relationship” and rarely argued. It seemed like
94 a strange thing to say, so I mentioned to her that her phone was going to be searched
95 and that I had witnesses willing to testify that they saw her and the victim arguing at the
96 pub.

97 She immediately backtracked on her story and admitted that she and the victim
98 had gotten into an argument at the bar and that there were some angry text messages
99 on her phone that are shown in Exhibit 3. I asked her what they had fought about, and
100 she said that she and an ATF agent named Edgar Jay had exchanged some flirtatious
101 texts and the victim had found out about them. Apparently, Jay was also at the bar and
102 the victim wanted to confront him, but she stopped him. He accused her of cheating,
103 and they fought.

104 She told me that Jay was also going to go to the party, and this was the reason
105 she didn’t want to go to the Stones’ house, so she ended up just dropping the victim off
106 at the house, then driving home. She admitted she had been drinking, and she probably
107 should not have been driving. She also said she told the victim to call her when he
108 wanted to leave and she would pick him up, but never heard from him. Her demeanor
109 and story seemed off to me, and I had already caught her in a lie about the fight. I
110 confronted her about the lie and reminded her that she had already confessed, and at
111 that point she said she wanted a lawyer and didn’t answer any more of my questions.

112 I am aware that the Department of Justice is questioning my investigation of this
113 case, but my investigation uncovered a motive, an opportunity, a murder weapon, and a
114 confession. There are no alternate suspects or elaborate conspiracy theories to
115 investigate because this is an open and shut case. The defendant got angry at the

116 victim after their argument, reversed the black Lexus SUV into him at high speed,
117 knocked him into the snow, and left him to die. The next morning, she panicked and
118 called Kai Morrison, so she'd have an excuse to find the body, and attempt to cover her
119 tracks.

120 No one at the Pueblo Police Department seems to have a problem with how I
121 handled this case. In fact, Sgt. Stone's wife reached out recently because she wanted to
122 give me a gift to thank me for how I handled everything. If only the DOJ and the Sheriff's
123 Department appreciated me the same way.

124 I mentioned that I have been placed on leave, and we might as well address that
125 elephant in the room. I belong to a chat group with some friends from high school. After
126 the charges against the defendant had been filed and the story hit the media, one of my
127 friends from the chat group asked if I knew anything about the case. I said that I was the
128 detective on the case, and everyone in the chat group started asking me details. I said
129 that I couldn't comment on the facts of an ongoing investigation, but that Karen Snow
130 was kind of crazy. Actually, the words I used were that she was a real nut job. I also
131 said she was a cop-groupie. Oh, and I said she dresses a bit scandalous. But my
132 investigation in this case is no different than my investigation in any other case. The
133 report was already out at that point and the charges had been filed, so I thought it was
134 fine to talk about it the way I did in Exhibit 4. Also, to give some context on who was
135 involved, I described the defendant's reputation just so they'd have a sense of what
136 happened, and nothing I said was false. Unfortunately, my department found out about
137 the texts, and I was placed on temporary leave pending an investigation. I also said:
138 "This whole thing would be easier if she just killed herself, lol." I was obviously kidding.

139 And when one of my friends commented: “The owner of the house where the victim was
140 killed could be in big trouble”, I did respond: “nope, he’s a cop too”. However, those
141 messages were just taken out of context. I simply meant that Philip Stone has a good
142 reputation in the community and, like I mentioned earlier, he gave me no reason to think
143 he was involved at all.

144 I have carefully reviewed this statement. It is true and accurate, and it includes
145 everything I know that could be relevant to the events I discussed. I understand that I
146 can and must update this statement if anything new occurs to me before the trial.

147 By: *Detective Jordan Mankeiwicz*

148 Detective Jordan Mankeiwicz

1 **CHASE MELVIN – WITNESS STATEMENT**

2 My name is Chase Melvin. I am a crime lab technician specializing in the forensic
3 analysis of evidence found on various technological devices. While the county police
4 department regularly consults with me for the analysis of evidence collected in their
5 investigations, I am not a police officer and have never served as one, neither for this
6 county nor any other. I now own my own company called FEA, Inc. which stands for
7 Forensic Evidence Analytics, Incorporated.

8 I studied computer science and biology at Indiana University Bloomington,
9 earning two bachelor's degrees in 2006. I then obtained my master's degree in 2009
10 from the University of Minnesota Twin Cities, specializing in biological science. After
11 completing graduate school in 2009, I was hired by FEA as a full-time assistant lab
12 technician. I worked in that capacity for five years, until I was promoted to Associate
13 Crime Lab Technician in 2014. After seven years in that role, I was promoted to my
14 current position of Senior Crime Lab Technician. I purchased FEA from its former
15 owner in 2022, but all of this is on my CV in Exhibit 6. Over the course of my
16 employment and ownership to FEA, I have processed biological and technological
17 evidence in dozens of criminal investigations for various law enforcement agencies,
18 including several homicide investigations. The Pueblo County Sheriff's Office regularly
19 consults me on matters concerning analysis of biological evidence, including DNA and
20 hair analysis, and concerning the analysis of technological data found on electronic
21 devices such as computers, laptops and cell phones.

22 In this case, I was first approached by Detective Jordan Mankiewicz on February
23 11, 2023, regarding a homicide scene the detective had processed earlier that day.

24 Detective Mankiewicz transmitted physical evidence that was collected at the scene to
25 the lab, as well as forensic data pulled from a number of devices. The physical evidence
26 our lab examined included pieces of a red plastic material collected from the ground
27 near the victim's body, DNA samples and hair collected from the rear end of a vehicle at
28 the scene, text messages, call logs, and other metadata from a handful of cell phones,
29 and data pulled from the internal computer of the vehicle found at the scene. While
30 some of the evidence arrived in unconventional storage containers like red plastic cups
31 and Ziploc bags, that is not entirely unprecedented. My experience is that in some
32 cases investigating officers have limited resources at the time they arrive at a fresh
33 scene and are sometimes forced to collect evidence using the materials available to
34 them at the time. In those instances, our lab processed the container materials as well
35 as the physical evidence they contained.

36 After processing and analyzing the evidence provided to me by Detective
37 Mankiewicz, as well as the information obtained from an autopsy of the victim's body, I
38 reached conclusions regarding the evidence collected from the scene and the victim's
39 body, digital evidence from the defendant's vehicle's event recorder, data from the
40 victim's cell phone, and data from Kai Morrison's cell phone. I'll go over each of those
41 conclusions.

42 First, with regard to the evidence collected from the scene and from the victim's
43 body, I analyzed pieces of a red plastic material reported to have been collected at the
44 scene where the victim's body was discovered. In my opinion, the fragments I examined
45 are of a similar construction and hue to the broken rear taillight of the vehicle that was
46 registered to the victim. The vehicle was already in the impound lot before I received the

47 pieces, so I later went to the impound lot and was able to directly match some of the
48 pieces to parts of the broken tail lamp. They fit like jigsaw puzzle pieces, and there is no
49 question the pieces came from that vehicle. According to Detective Mankiewicz, this
50 vehicle was apparently driven from, and later back to, the scene by Defendant Karen
51 Snow. Detective Mankiewicz informed me that the vehicle was impounded from the
52 scene as part of the investigation. It is not possible to tell from the plastic pieces where
53 or when the tail lamp was broken but based on the location where Detective Mankiewicz
54 reported finding the plastic fragments suggests to me that the rear taillight of the vehicle
55 was broken in an impact of some kind.

56 Next, I examined the samples of biological material collected from the ground
57 near the victim and from the rear of the vehicle. I confirmed these samples to be blood
58 droplets and strands of human hair. At the time I received these samples, the victim,
59 John Murphy, had already been transported to the morgue and samples of his DNA had
60 been collected by the coroner. The blood and hair samples reportedly collected from the
61 scene and the vehicle contained genetic material matching the DNA profile of samples
62 collected from the victim's body during the autopsy. To be more precise, the odds that
63 the DNA originated from John Murphy as opposed to a random, unrelated individual are
64 greater than four septillions to one. A septillion is a one followed by twenty-four zeros.
65 No other DNA profiles were detected either in the biological samples or in the
66 containers in which they arrived. Considering this evidence, I conclude that, at some
67 point in time, the victim's head came into contact with the rear taillight of Snow's vehicle
68 with enough force to cause the plastic taillight housing to break, cause the victim's blood

69 to fall to the ground, and cause trace amounts of the victim's hair to be deposited
70 around the taillight housing.

71 As part of my analysis, I also reviewed the victim's autopsy report shown in
72 Exhibit 2. Based on this report, the blunt force injuries and abrasions found on the
73 victim's body are consistent with injuries I have observed in other pedestrian/vehicle
74 collisions. Specifically, the lacerations observed on the victim's arm are consistent with
75 a vehicular impact, and the injury to the back of the victim's skull is consistent with a
76 secondary impact between the victim's head and the ground.

77 With regard to data available from the defendant's vehicle, over the last decade,
78 automobile manufacturers have begun adding computerized safety systems to their
79 vehicles. Their primary function is to record data regarding the vehicle's operation when
80 certain conditions are met. These systems are commonly referred to in the industry as
81 "event recorders" or "black boxes." Similar systems have been deployed in airplanes for
82 decades, but they have become more commonplace in consumer motor vehicles in
83 recent years.

84 The event recorder system in the victim's vehicle is set up to record data such as
85 mileage traveled, speed, braking force, steering wheel movement, gear shifting, and
86 engine revolutions per minute when certain events, like sudden stops, occur. I reviewed
87 the raw data which I downloaded from the defendant's vehicle after it was impounded
88 by Detective Mankiewicz. This data, shown in Exhibit 7, does not allow me to determine
89 the time but only the mileage at which the events occurred.

90 The software logged a triggering event approximately 36 miles prior to the
91 vehicle being impounded at the scene. Based on information Detective Mankiewicz

92 received from Karen Snow, and using multiple alternative routes in Google Maps, I was
93 able to estimate the distance between the scene where the body was found and the
94 defendant's home address. The total distance the vehicle would have traveled from the
95 homicide scene to the defendant's residence, then back to the homicide scene, was
96 between 36.1 and 38.8 miles.

97 In the triggering event, the event recorder data showed the vehicle moving
98 forward slightly, shifting to reverse, then quickly accelerating to 24.2 miles per hour.
99 Then just 0.52 seconds later, the speed dropped to 15.6 miles per hour, and the
100 steering wheel jostled slightly. In my opinion, these changes in speed and steering
101 wheel position in that short amount of time are consistent with an impact of some sort,
102 possibly with a pedestrian.

103 With regard to data from the victim's cell phone, I examined a forensic image of
104 his phone, and the text messages actually found on the phone when it was seized as
105 evidence. A forensic image is, in essence, a complete digital copy of a device that
106 includes all text messages, call logs, and associated metadata.

107 Leading up to the death, the victim and defendant engaged in several arguments
108 through text messages related to their relationship, as seen in Exhibit 3. A particularly
109 notable exchange happened on the night before John was killed, during which the
110 defendant asked why the victim was "trying to push me away." The final text exchange
111 on the victim's phone reflects an argument between the victim and the defendant on the
112 evening before the victim's body was discovered. The defendant stated, "it was nothing
113 and you know that," and the victim said "things just haven't been great between us for a

114 while.” The defendant then says “I’m sick of this constant fighting. It feels like every
115 week it’s a new blow up with you.”

116 Later, at 12:26:23 a.m. on February 11, 2023, the defendant texted the victim: “I’m
117 on my way home. Roads are bad,” and “have a good time at the party, call me when
118 you’re done, and I’ll come pick you up.”

119 The call logs on the victim’s phone show that hours later, at 5:00:47 a.m. on
120 Saturday, February 11, 2023, the defendant began calling the victim’s phone
121 repeatedly. At 5:06:31 a.m., she texted the victim: “Where are you? Please answer.”
122 Based on my analysis of the metadata on the victim’s phone, I can confirm the time and
123 date stamps of the call log attached as Exhibit 8, as well as the content of the text
124 messages attached as Exhibit 3, is accurate and has not been tampered with.

125 I also later learned that the defense had their expert witness, London Holt, download
126 and analyze data captured from the Health App on the victim’s phone. Dr. Holt
127 interprets that data to suggest the victim went inside the home where his body was
128 discovered and went up and down three flights of stairs. I respect Dr. Holt, but in my
129 opinion the data Dr. Holt’s opinion is based upon simply is not reliable. In fact, the
130 Health App data also suggests the victim took several steps after 6:00 a.m. on
131 Saturday, February 11, 2023, after his body was discovered and he was clearly dead.
132 Accordingly, I do not believe any evidentiary weight should be afforded to the Health
133 App’s staircase data.

134 Finally, with regard to Kai Morrison’s cell phone in Exhibit 1, Dr. Holt claimed to have
135 determined that Kai Morrison performed two searches for “how long to die in the cold,”
136 at 2:30:16 a.m. and 6:00:32 a.m., respectively, on Saturday, February 11, 2023. If true,

137 it would have meant that Kai Morrison, who had been at the location where the victim
138 was killed, looked into how long it would take for a person to die from exposure within
139 an hour after leaving the Stone residence and several hours before going back to that
140 residence with the defendant and finding the victim's body. The critical part of that
141 statement is "if true," because Dr. Holt misinterprets the data. More specifically, the
142 metadata from the browser on Kai Morrison's cell phone shows the first search at
143 2:30:16 a.m. as being "Deleted." That is a code that comes from digital forensics
144 software that was used to download the data. I am very familiar with that software and
145 have used it multiple times. It is true that, if a person were to conduct an internet search,
146 then delete the search in the browser's history, the forensics software would show the
147 subject of the search but mark that search as deleted. However, there's a bit of lazy
148 programming that apparently went into the software, and if a person were to open a
149 browser tab but not enter any search terms, and if that person later were to use that
150 same browser tab to perform a search, rather than show no search was performed, the
151 forensic software would attribute the same search terms to the time the browser was
152 opened and the time the search was actually conducted and would mark the first entry
153 as deleted. So, yes, it's possible Kai Morrison conducted the exact same search at 2:30
154 a.m. and 6:00 a.m., but I believe it is more likely Kai Morrison simply opened the
155 browser tab at 2:30 and performed the actual search at 6:00.

156 I have carefully reviewed this statement. It is true and accurate, and it includes
157 everything I know that could be relevant to the events I discussed. I understand that I
158 can and must update this statement if anything new occurs to me before the trial.

159

By: *Chase Melvin*

160

Chase Melvin

1 **LONDON HOLT - WITNESS STATEMENT**

2 My name is London Holt, Ph.D., P.E. I have been retained by the Defendant,
3 Karen Snow, to offer my expert opinion in forensics regarding the cause of the injuries
4 sustained by the decedent, John Murphy. I have also been retained to opine on the
5 cellular and vehicle data collected during the investigation of Mr. Murphy's death. I am a
6 biomedical engineer and private forensics expert. I graduated from the University of
7 Colorado with a Ph.D. in Biomedical Engineering in 2000. While I was working toward
8 my Ph.D., I worked as an intern at the Boulder County Coroner's Office. I earned
9 undergraduate degrees in Math and Computer Science from Stanford University in
10 1992.

11 After graduating from the University of Colorado, I earned a job as a full-time
12 professor for the University of Southern California and spent the first five years of my
13 career teaching numerous classes, including biomedical engineering and computer
14 science. While teaching, I published a study about high-speed motor vehicle, and
15 pedestrian accidents in *Nature Biomedical Engineering*.

16 In 2006, I moved back to Colorado and started my own private forensics firm
17 working on both civil and criminal cases. As part of that practice, I became a BOSCH
18 certified data retrieval technician and specialist. In my time as a private investigator, I
19 have published articles on the accuracy and pitfalls of GPS and EDR tracking data for
20 *Collision Magazine*. Over the past twenty years, I have been retained by plaintiffs,
21 defendants, insurance companies, and criminal defendants to opine on a broad range of
22 issues related to biomechanics and data assessment. My curriculum vitae in Exhibit 9
23 provides a complete listing of my credentials.

24 I have reviewed the police investigation file, including the detective's report and
25 the medical examiner's report. I have also reviewed the EDR data collected from the
26 Black Lexus SUV, Wi-Fi tracking data collected from the victim's phone while at the
27 Stone residence, metadata collected from Kai Morrison's phone, and Chase Melvin's
28 report. The detective did not take photographs of the scene or the victim's vehicle. The
29 victim's car was no longer impounded at the time of my work, so I was unable to
30 examine it.

31 Based on my review of the photos and the medical examiner's report, Mr.
32 Murphy died of a skull fracture to the back of his head that caused bleeding in his brain.
33 He also suffered scratch marks and lacerations on his face and arm. He had two black
34 eyes and bruises on the back of his hands. However, his legs and pelvis were
35 unscathed except for a pinpoint bruise on the side of his right leg.

36 Mr. Murphy's injuries are consistent with defending himself in a fight. In
37 particular, Mr. Murphy's black eyes, lacerations to his face, and the bruising on the back
38 of his hands are consistent with defensive wounds in a fight with a large man. Mr.
39 Murphy has scratches and small wounds on his face and arms that are consistent with
40 puncture wounds. The medical examiner's report indicated, without comment, that these
41 wounds could have been caused by being struck by a vehicle. There is no way the
42 scratches could have been caused by pieces of plastic from a broken taillight, and the
43 wounds on Mr. Murphy's arm look nothing like what I would expect to see if he had
44 been hit by a vehicle. Instead, they look exactly like bite and scratch marks. The
45 location of the scratches on Mr. Murphy's face indicates he may have been on the
46 ground while he was attacked by a dog using its claws and possibly its teeth. In my

47 opinion, the injuries are consistent with Mr. Murphy getting in a fight, possibly with the
48 much larger ATF agent Edgar Jay, and the Stone's German shepherd attacking him
49 during the fight. Further, Mr. Murphy's skull fracture was caused by blunt force trauma
50 to the back of the head, and it is consistent with his head being slammed against a hard
51 object, like concrete. Despite this, my understanding is that Mr. Murphy was found lying
52 face-up in a snow pile.

53 Given these facts, it is my opinion that Mr. Murphy's injuries could not have been
54 caused by a vehicle backing into him at 24 mph as expressed by Chase Melvin and the
55 medical examiner. If Mr. Murphy had been struck at 24 mph by the SUV, then his body
56 would have shown signs of significant injury to his legs and pelvis including bruising, leg
57 lacerations, and fractures. However, Mr. Murphy's legs and pelvis showed no signs of
58 significant trauma. Moreover, the theory expressed by Chase Melvin provides no
59 explanation for the scratch marks and lacerations found on Mr. Murphy's arms and face.

60 Additionally, damage to the vehicle's rear taillight is not consistent with the
61 injuries to Mr. Murphy. It cannot be determined with a high degree of scientific certainty
62 what caused the damage the SUV's rear taillight, or whether such damage arose during
63 this incident. This is because the police did not follow proper procedure and take a
64 photo of the rear of the SUV. Therefore, it is unclear what, if any, damage the vehicle
65 may have suffered or when. Nevertheless, damage to the taillight suggests injuries to
66 Mr. Murphy's lower body and midsection, not to his face and hands. Therefore, it is
67 highly unlikely that Mr. Murphy's injuries arose from contact with the SUV's taillight.

68 Considering Mr. Murphy's injuries, I believe it is likely he struck his head falling
69 on the floor after a fight inside the residence and was dragged outside and left in the
70 snow and that he was not struck by Karen Snow's SUV at all.

71 I also reviewed the metadata from Kai Morrison's phone and the phone's search
72 history. Based on that review, I can state with a high degree of scientific accuracy that
73 Kai Morrison searched "how long to die in the cold" at both 2:30 a.m. and 6:00 a.m. on
74 the date of the incident. A search history and its associated metadata is locally stored
75 by web browsers on smart phones which allows users to return to previously visited
76 sites and searches. When the user makes a search on a web browser the metadata
77 records the time and search terms such that the user can easily return and reuse the
78 search terms in the future. However, in order for search metadata to be stored initially,
79 there must first have been a search because web browsers do not save the data until
80 an actual search has been conducted.

81 Thus, the collection of the metadata is a lot like taking a timestamped
82 photograph. On a camera, you can turn on a timestamp that puts a little watermark in
83 the corner of the photograph for when the picture was taken. This is essentially what
84 web browser metadata does. When you press the search engine, it is like pressing the
85 capture button on your camera. The picture, i.e. the search term, is frozen in time and
86 there is a watermark in the metadata for when the term was searched. However, much
87 like a camera, if you do not click the search button to conduct an actual search, then the
88 metadata does not record. It would be like holding your camera up to take a photograph
89 but not pressing the capture button. In that scenario, you would not get a photograph,
90 and, in the case of a web browser, there would simply be no data.

91 Under Chase Melvin's theory, the browser was opened at 2:30 a.m. and then at
92 6:00 a.m. but there was no actual search for "how long to die in the cold," at 2:30 a.m.
93 even though there is timestamped metadata associated with "how long to die in the
94 cold" at 2:30 a.m. This theory is not consistent with how search data is locally stored on
95 the phone. If you were to open a web browsing app and type nothing, then there would
96 be no search history because the user did not search anything. However, if you were to
97 open the app and search "how long to die in the cold," then the web browser would
98 create a locally stored browser search history for those terms with a timestamp of when
99 those terms were searched.

100 Chase Melvin also claims the search metadata only shows "deleted" at 2:30 a.m.
101 and that this is consistent with opening the web browser app and then searching
102 nothing. This is incorrect. Again, if there is no search, then there is no metadata search
103 history. There is a process by which users can delete search history on their phone. It
104 requires the user to go into the web browser's settings, select search history, and then
105 the user can identify specific searches they may want to delete. It is a relatively
106 extensive process, and only through this process would search data show as "deleted."
107 I am aware that Chase Melvin has recently come up with a slightly modified theory that
108 places the blame on the forensic software that translates the metadata. I have never
109 heard of that software filling in the same search terms two separate times and mark the
110 first one as deleted simply because a browser tab was opened, and a search was not
111 immediately conducted. In fact, if that was true, it would presumably do so any time
112 someone opened a browser but did not immediately enter a search. Yet I have never
113 seen it happen. Candidly, my review of the metadata contradicts Chase Melvin's

114 findings. My review of the same data shows “how long to die in the cold” was searched
115 twice on Kai Morrison’s phone. The first search was conducted at 2:30 a.m., and the
116 second search was conducted at 6:00 a.m. on the day Mr. Murphy died.

117 I also reviewed location tracking data for Mr. Murphy. After reviewing the data
118 from his smartphone, I can state with a high degree of scientific certainty that Mr.
119 Murphy was inside Phillip Stone’s residence on the day he died. Mr. Murphy’s phone
120 was equipped with Wi-Fi. The Stone residence, along with many of their neighbors, has
121 a Wi-Fi router with tracking. Wi-Fi tracking is a geolocation system that uses Wi-Fi
122 routers to pinpoint the location of Wi-Fi devices whenever the devices are indoors. It
123 can be used by physical stores to analyze the behaviors of their customers and by
124 companies to get an overview of their warehouses. It can also be used by investigators
125 to track the location of particular individuals, like Mr. Murphy.

126 Wi-Fi tracking does not require the phone to be connected to the Wi-Fi network.
127 Instead, Wi-Fi routers in the area act like cell towers to geolocate the phone’s
128 positioning but with greater accuracy than GPS. Wi-Fi tracking is accurate to within 5-40
129 meters depending on the environment and the number of Wi-Fi access points. The Wi-
130 Fi tracking data from the day that Mr. Murphy died shows that his phone was most likely
131 inside the Stone residence. Technically, if the accuracy was toward the upper end of the
132 range, Mr. Murphy could have theoretically been outside of the residence, however,
133 there is additional support that shows that Mr. Murphy’s phone was inside the house
134 that you can see in Exhibit 10. Mr. Murphy’s health app data indicated that he took 80
135 steps and climbed three flights of stairs in the location of the Stone residence. The only

136 reasonable explanation for this Health App data is that Mr. Murphy was inside the Stone
137 residence, which has a staircase.

138 I have read Chase Melvin's report that indicates the Health App data is unreliable
139 because Mr. Murphy's phone also shows he took steps after Mr. Murphy's body was
140 found. In my opinion, it is not the Health App data that is unreliable, it is the police
141 investigators. A police investigator could have picked up the phone and walked around
142 with it soon after discovering Mr. Murphy's body, which could explain why the data
143 would indicate that the holder of the phone took steps. This is not proper police
144 procedure but, much like the lack of photos taken of the rear of the SUV at the scene,
145 the investigation into Mr. Murphy's death was shoddy, at best. Additionally, because Mr.
146 Murphy's phone was found on his body, it is highly probable that it was Mr. Murphy who
147 had the phone while it was tracked inside the Stone residence.

148 Chase Melvin opines in his report that the Event Data Recorder (the "EDR") in
149 Karen Snow's SUV shows there was a triggering event consistent with a pedestrian
150 strike. I concur that there was an EDR event that occurred, but I do not agree that the
151 trigger event is indicative of a pedestrian strike.

152 EDRs are always tracking data, but most of this data is lost and not recorded
153 until a triggering event. A triggering event could be a sudden impact, but it can also be a
154 rapid change in speed. Once a triggering event occurs, the EDR data records a
155 snapshot of the vehicle's data for approximately thirty seconds or less surrounding the
156 triggering event, including data that occurred prior to the triggering event. The recorded
157 data typically shows the speed, acceleration, and braking of the vehicle, among other
158 things. In my opinion, the EDR triggering event was not a pedestrian strike, but the rapid

159 reverse acceleration of the vehicle up to 24.2 mph. The EDR in Exhibit 7 then shows a
160 drop in speed to 15.6 mph and an indication that the steering wheel jostled, which is
161 indicative that the vehicle struck and rolled over something, possibly a curb.

162 Chase Melvin opines that the SUV was driven thirty-six miles after the triggering
163 event, and that this is consistent with Karen Snow driving to and from the Stone
164 residence on the date of Mr. Murphy's death. I agree that the SUV was driven thirty-six
165 miles after the triggering event. I disagree that this shows that Ms. Snow drove to and
166 from the Stone residence. EDR provides precise data at the time it is triggered. As a
167 result, we know the precise mileage of the SUV when the EDR was triggered, and we
168 can subtract this from the vehicle's odometer to determine how far the vehicle traveled
169 after the trigger event, which was precisely thirty-six miles.

170 Chase Melvin then used Google Maps to measure the distance between the
171 Stone residence and the Snow residence. Melvin determined the distance to go from
172 the Stone residence to the Snow residence and back to the Stone residence was 36.1
173 to 38.8 miles. However, using Google Maps to determine the distance between two
174 locations is not a widely accepted scientific method because it is fraught with
175 inaccuracy. Frankly, driving a vehicle with a known odometer reading between the two
176 locations would be more accurate than Chase Melvin's procedure. Regardless, even
177 under Chase Melvin's procedure, the EDR data shows that the SUV only traveled 36
178 miles after the trigger event. Therefore, Chase Melvin's theory cannot account for .1 to
179 2.8 miles, which means the SUV was likely not driven between the Stone and Snow
180 residences, even under Chase Melvin's methodology.

181 In my opinion, the data cannot definitively show where the vehicle was driven. It
182 can only show how far the vehicle was driven after the last recorded event. Given that
183 the trigger event was likely the vehicle's sudden reverse acceleration, the distance the
184 SUV traveled after the event is a non-issue. Additionally, because no GPS was used
185 and we do not know precisely when the 36 miles was driven after the recorded event, it
186 could indicate an attempt to stage the event. For example, a police officer could have
187 driven the SUV 36 miles round trip from the police holding facility because the officer
188 searched the distance between the Stone and Snow residence and figured they were
189 approximately 36 miles apart and so put 36 miles on the SUV.

190 All of my opinions are based on widely accepted scientific methodologies within
191 the scientific community and are more probable than not based on a fair application of
192 those methodologies.

193 I have carefully reviewed this statement. It is true and accurate, and it includes
194 everything I know that could be relevant to the events I discussed. I understand that I
195 can and must update this statement if anything new occurs to me before the trial.

196 By: *London Holt*

197 London Holt

1 **ADRIAN CANNING – WITNESS STATEMENT**

2 My name is Adrian Canning. I am a snowplow driver for the City of Pueblo. In the
3 off-season, I also deliver pizzas to make ends meet. I initially met the Stone family
4 through their eldest child, Streeter, and went on to meet Phillip and Jeanette after we
5 were partnered up for the science fair. The night John Murphy died, there was a
6 snowstorm, and I was on plowing rounds on the street where the Stones live.

7 There was already snow on the ground that had remained from earlier storms,
8 but the streets were fairly clear. Throughout the night, the snow was constant but not
9 too heavy. As I continued to plow, the snow piles kept growing from all of the plowing I
10 had done earlier in the week. I plowed around the Stone’s house three times that night.
11 We all know that if I didn’t plow it, it would turn to ice in the morning, and nobody wants
12 that. I have three rules when plowing: sight, search, and scrape.

13 First, I have to have a proper view of the road, my seat has to be over the plow,
14 and I need my headlights on at all times. My headlights are so bright it’s almost like
15 driving with spotlights. This is especially important when considering how dim the
16 streetlamps are in that area. Other parts of the city have great streetlamps, and I have
17 always thought this part of town to be a bit dimmer and darker, which makes it more
18 challenging to see the road properly. Luckily, I have those great headlamps, so it's
19 never really been an issue. My headlights help to make everything just a bit sharper and
20 more visible.

21 Second, I need to be vigilant of my surroundings. Sight helps with this one, of
22 course, but I always must be watching to make sure I don’t accidentally run into
23 pedestrians, cars, or God forbid, any animals. I remember the first time I hit a deer. I

24 was a mess, thinking I should've seen her and it was all my fault. That deer had a
25 family. Maybe she had kids. I couldn't complete my rounds that night. I needed to
26 search my surroundings more that night and swore I would be ever-vigilant of my
27 surroundings each time I was plowing - especially at night. I promised myself I would
28 never be so careless as I was that night. Never again.

29 Third, I have to make sure I scrape and plow the road. How are people supposed
30 to get to work if they're driving on black ice and compacted snow? This is really the
31 most important part of the job. I mean, it's what they pay me for, right?

32 During my first round that morning, I passed the Stones' house at around 1:45
33 a.m. Nothing special stood out when looking around their yard and the neighboring
34 yards. There also weren't any cars in front of the house. All I saw was a slow trickle of
35 snowflakes from the sky. However, during my second pass at around 3:30 a.m., I
36 noticed a dark red Ford Edge SUV in front of the house on the street. I was a little
37 annoyed since I then had to drive around it. Whenever I do that, it can potentially block
38 the car in with the snow I plowed, and people get so upset when we block their cars in. I
39 also have to be extra careful when driving around vehicles because the plow is so wide
40 I need to be sure I'm not swerving into any cars on the other side of the street and also
41 be sure I don't hit the car I'm trying to maneuver around.

42 My third round landed me in front of the Stone house after 5:00 a.m., though I
43 can't be sure exactly when, as this pass was much more eventful than my last two. I
44 remember seeing all the police cars surrounding the house; the bright flashing lights
45 were the most obvious. As I drove by, it almost looked like there was a covered body in
46 the yard, which most definitely wasn't there when I had passed by. At least, not at 1:45

47 a.m. when I last looked in the yard. The next thing I noticed was who I now know was
48 Karen Snow talking to someone in a sheriff's uniform. She was obviously distraught,
49 saying, "I killed him!? I killed him!?" like she couldn't believe what that sheriff was
50 saying. She was so loud, that I could hear her over the noise from the plow and I had
51 slowed down to get around all the vehicles. I think that the sheriff may have been the
52 main detective, like in all those cop shows, but I really can't be sure. The final thing was
53 a black Lexus SUV, which was parked where the Ford Edge was parked when I did my
54 last round. I know for a fact it was a different car than my pass at 1:45 a.m. When you
55 do the same rounds in the early hours of the night, you take notice of the little things. I
56 was focusing more on the body and the cops, and the poor woman being accused of
57 murder, but I am almost sure that there was no damage to the Lexus or its taillight. I
58 parked a few houses down after that to see what was happening. I could only see
59 someone, who I understand now was Kai Morrison, talking to the sheriffs and going in
60 and out of the Stones' house. The Stone family also kept going in and out of the house.
61 The sheriff officers outside the house never went into the house, and I thought it was so
62 strange. I figured and hoped that the Stone family had nothing to do with it or weren't
63 suspects, but I couldn't have done anything about it anyway.

64 There was no way that the car was a black Lexus SUV. It was definitely a Ford
65 Edge. I mean, I admit the streetlights on that street can distort the color of the
66 surroundings. Those streetlights happen to be very yellow because they are sodium-
67 vapor lamps. They make everything look oddly colorless, almost like one of those old
68 black and white movies. But I'm fairly certain the SUV was dark red and not black, and

69 it was definitely a Ford Edge. It's true, I didn't say what type of SUV it was, when I was
70 talking to that reporter, but I didn't know that detail was important at that time.

71 After a while, a few news reporters showed up. I walked over to tell them about
72 what I saw. In hindsight, I hope I wasn't too nervous. This is Channel 7 we're talking
73 about. My big break to tell the world what I needed them to know. So naturally, I also
74 made a PSA about trying to pass snowplows and how dangerous they are, and I think I
75 also mentioned how snowplows don't intentionally block cars when they park on the
76 street. Some people just don't understand that it's uncontrollable. The snow will go in
77 the direction of the plow, which is to the side where your car is parked. It's not my fault. I
78 mentioned the SUV parked in front of the house as a reference too. They asked me a
79 few things about what I saw when I drove by, and I told them there wasn't anything in
80 the yard the first two times I drove by, but I stopped on the third, this pass. Then I
81 realized the snow was still coming down, and I probably should continue plowing the
82 roads. It's not like my boss would've known I wasn't unless, of course, he was watching
83 the news. The news crews were still around by the time I left.

84 I have carefully reviewed this statement. It is true and accurate, and it includes
85 everything I know that could be relevant to the events I discussed. I understand that I
86 can and must update this statement if anything new occurs to me before the trial.

87 By: *Adrian Canning*

88 Adrian Canning

1 **NEVADA MORALES – WITNESS STATEMENT**

2 My name is Nevada Morales. I am a forensic criminologist, police/corrections
3 expert, Certified Medical Investigator (physician’s level) and a former Criminal Justice
4 Training Center and police academy director with over 45 years of extensive and
5 diverse experience in police/corrections and security practices experience. My
6 extensive range of experience and expertise includes Police Use of Force, Police Best
7 Practices, Major Crime Scene Management, Police Labor – hiring and retention and
8 termination, homicide, wrongful death, and other complex investigations, including
9 criminal conspiracy, assault, kidnapping for ransom, and murder for hire, but you can
10 read all about it in my curriculum vitae in Exhibit 11.

11 I have been working for the U.S. Department of Justice as a Police Procedures
12 Expert Investigator for over thirty years. Before joining the U.S. Department of Justice, I
13 spent twelve years as the Officer-in-Charge of the most critical investigative units in the
14 Los Angeles Police Department, including The Special Investigation Section, Homicide
15 Special, Robbery-Homicide Division, and the FBI Violent Crime Task Force-Los
16 Angeles. For the last five years, I have given annual presentations at the Criminal
17 Investigator Training Program with the U.S. Department of Justice on issues in crime
18 scene investigation. I will also be a featured commentator in an upcoming documentary
19 entitled “Reasonable Doubt,” involving police investigative procedures used during a
20 homicide investigation.

21 The U.S. Department of Justice brought me in to look into the investigation of the
22 death of John Murphy after reports surfaced of the comments made by Detective
23 Jordan Mankiewicz concerning his investigation of this potential homicide. Specifically,

24 we received reports that Detective Mankiewicz posted about the investigation, in a
25 group chat with several of Detective Mankiewicz’s civilian friends, days after the
26 investigation began. It was reported that, in these comments, Detective Mankiewicz
27 denigrated the primary suspect in the investigation, Karen Snow, referring to her as a
28 “cop groupie” and stating that she “dressed scandalously” and that she “was a real nut
29 job.” Detective Mankiewicz also made statements in this group chat suggesting that
30 local investigators were not seriously considering the law enforcement officials that were
31 present at Sergeant Phillip Stone’s house the night of Mr. Murphy’s death as potential
32 suspects.

33 Once my team began digging into the details of the investigation being led by
34 Detective Mankiewicz, we not only confirmed the concerning details addressed in initial
35 reports, but found additional concerning information regarding how this investigation
36 was being handled. One of our major areas of concern with this investigation was that
37 evidence collection and chain-of-custody procedures were being flagrantly disregarded
38 by Detective Mankiewicz and other officials at the Sheriff’s Department.

39 The investigation was hindered from the start by a failure to treat the Stone
40 house as a possible crime scene and a failure to treat the witnesses as possible
41 persons of interest. The party attendees included several people that should have been
42 investigated by police as potential suspects. Among them: Edgar Jay, a Bureau of
43 Alcohol, Tobacco and Firearms agent who’d been sporadically flirting with Snow in the
44 lead-up to Murphy’s death. Text messages between Snow and Murphy in Exhibit 3
45 indicate that Murphy was aware of Snow’s relationship with Jay—and that Murphy had
46 threatened to “smash his face in” the next time he saw him. I am not aware of any direct

47 evidence to support an inference that Jay was involved in the death of Murphy in any
48 way. However, Mankiewicz's failure to consider Jay as a suspect is troubling, and there
49 is no way to know what evidence would have been unearthed by a proper investigation.

50 Stone's house was never searched for signs of a fight involving Murphy and the
51 crime scene was not secured. Multiple witnesses were allowed to go in and out of the
52 Stone house the morning Murphy's body was found, even while an active investigation
53 was underway. Further undermining the Sheriff's Department's investigation were the
54 bizarre methods they used to collect evidence, including using leaf blowers to clear
55 away snow (and potentially evidence) at the crime scene, and using solo cups and
56 sandwich bags to collect physical evidence. The fact that the assigned detective failed
57 to arrive at the scene of a possible homicide with a proper evidence collection kit,
58 instead resorting to the use of solo cups and sandwich bags, is questionable at best. I
59 admit I am unaware of the resources that were available to the Pueblo Sheriff's
60 Department on the morning the evidence collection took place.

61 In virtually every investigation of a potential homicide, many types of trace
62 evidence may be found at the crime scene. The proper packaging of each type of
63 evidence is essential for conducting the necessary analysis. Fluid collection kits, HEPA
64 vacuums with special filters, combs, brushes, vials, envelopes, and bindle paper are
65 some of the specialized items needed to retrieve, package, and store such evidence.
66 Although this does not appear to have materially affected the investigation here, as the
67 only trace evidence collected here was from the victim (whose identity is not in dispute),
68 the use of these specialized items to collect blood samples and other trace evidence is
69 necessary to ensure that the evidence remains intact and protected from contamination

70 until it can be processed and tested. To be clear, even though the lack of proper
71 collection kits did not materially impact the investigation, this is because there was a
72 lack of trace evidence. This lack of trace evidence could be because there simply was
73 not much trace evidence, or because law enforcement failed to follow proper procedure
74 in securing the scene. I am not aware of any reason to believe that trace evidence was
75 either lost or contaminated, despite the Sheriff's Department's questionable collection
76 tactics.

77 However, evidence collection methods are also crucial for maintaining a well-
78 documented chain of custody of each piece of evidence collected, and the investigators'
79 failure to maintain a proper chain of custody is a matter of legitimate concern for this
80 investigation. The chain of custody must be maintained for all items of evidence
81 recovered. Whenever an item of evidence is transferred from one person's control to
82 another person's control, that transfer must be documented. The chain of custody
83 begins at the crime scene. To ensure that this occurs, all investigators and responding
84 officers are trained to collect evidence in a sealed bag or envelope; close, seal, or tape
85 the paper bag or envelope; and write their initials, date, and time across the sealed
86 area. In addition, a separate chain of custody form must accompany different evidence
87 bags, which, among other information, shall include the signatures of everyone involved
88 in the chain of possession with date and time. Each time the person in charge of
89 evidence is changed, an entry of signature, date, and time is necessary for the chain of
90 custody form. In this case, trace evidence collected in solo cups and sandwich bags
91 were neither properly sealed nor marked, and there is no record of the chain of custody
92 for any evidence collected at the crime scene between the time the evidence was

93 collected by Mankiewicz and when the trace evidence was collected by Chase Melvin
94 for forensic analysis. Although I do not have any specific reason to believe that the trace
95 evidence was tampered with or contaminated, the lack of chain of custody
96 documentation is concerning.

97 It is also puzzling that Mankiewicz, apparently, did not have access to a crime
98 scene photographer or personal camera to thoroughly photograph the condition of the
99 crime scene and physical evidence, as it was found by investigators, before collecting
100 the evidence and disturbing the crime scene. Regardless, even assuming Mankiewicz
101 did not have the ability to take photographs when the detective arrived at the scene, any
102 reasonable investigator would have waited for a crime scene photographer to arrive to
103 photograph the blood splatter and other evidence found at the scene before it was
104 removed for collection. Similarly, Mankiewicz's decision to impound Snow's vehicle
105 without photographing the condition in which it was found was a breach of standard
106 operating procedures. As a lead homicide investigator, Mankiewicz's responsibility was
107 to minimize the amount of disturbance to the scene as much as possible until all
108 observations of the scene were meticulously documented. Mankiewicz should have
109 taken time to absorb all details of the scene and carefully documented all observations
110 (what the officer sees, hears, smells, etc.) before removing physical evidence or
111 otherwise disturbing the crime scene. Only after this documentation has been
112 completed should physical evidence be collected per standard evidence collection
113 procedures.

114 Obviously, Mankiewicz's decision to remove key pieces of evidence from the
115 scene—and to disturb the scene by using a leaf blower to clear the snow, potentially

116 destroying relevant evidence, such as footsteps and other imprints in the snow, and
117 trace evidence—before taking these steps goes against standard protocol. This is basic
118 stuff, and Mankiewicz, just like any other officer that would be in position to investigate a
119 homicide, was trained to proceed cautiously to not contaminate or destroy possible
120 evidence. The fact that this did not occur here is highly concerning and, in my opinion,
121 calls into question the reliability of every piece of physical evidence that the prosecution
122 is now relying upon in its case against Snow.

123 There was also the delay in locating what would have been obvious to any
124 investigator as an incredibly significant piece of evidence: broken pieces of Snow's
125 taillight. The pieces of broken taillight from Snow's vehicle were not located until after
126 the vehicle had been impounded, at which point the broken pieces were suddenly
127 unearthed by Mankiewicz, in a manner that was not clearly documented at the time the
128 pieces were discovered. This is particularly concerning considering that a broken
129 taillight on Snow's vehicle was never documented at the scene, and a witness at the
130 scene reported that the taillights on the vehicle appeared intact. While I have seen no
131 conclusive evidence suggesting that this evidence was planted to frame Snow,
132 homicide investigators are trained to remain vigilant against the possibility that tainted
133 evidence could emerge. The investigators here failed to employ two primary procedures
134 that are used by law enforcement to guard against this very possibility: (1) securing the
135 crime scene, which prevents the perpetrator from returning to the scene to destroy or
136 taint the evidence (as well as preventing other bystanders from unintentionally
137 disturbing the evidence); and (2) conducting a thorough sweep of the scene for potential
138 evidence at the outset using the standard search methods used by law enforcement.

139 Standard procedure for an outdoor crime scene of this size is for law
140 enforcement to use either the strip method or grid method to search the scene
141 thoroughly before leaving the scene. Both methods are effective in large, open areas
142 and are easily implemented using any number of searchers. Both methods of searching
143 a crime scene are displayed in Exhibit 12. I recognize that in crime scenes involving
144 active or recent snowfall, proper crime scene search patterns can be more difficult to
145 implement, particularly where there is a concern that evidence may be partially or
146 completely covered by snow at some layers. However, a proper search remains
147 essential.

148 The freezing weather conditions at the time investigators arrived on the scene is
149 no excuse for breaching these procedures for collecting witness statements. Typically, a
150 brief interview should be done at the scene to establish whether a potential witness has
151 information about the incident, and then the witnesses should be transported to a law
152 enforcement facility (or another secure location) to conduct a more formal and detailed
153 interview, where the interview can be written, audiotaped or both. Investigators are
154 trained to keep witnesses separated when they are being transported to another
155 location for interviews. If two witnesses must ride in the same vehicle, the transporting
156 officer must not allow them to discuss what they observed.

157 Many of the witnesses who were at the party, including Kai Morrison and the
158 Stones, exchanged a litany of phone calls to one another throughout the time Murphy
159 supposedly lay on the lawn, according to phone records. Several of these persons
160 claimed that the calls were "butt dials," placed randomly and by complete mistake. As
161 circumstances go, it's eyebrow-raising, to say the least.

162 There is also the fact that records from Kai Morrison’s cellphone suggest that
163 Morrison may have searched the phrase “how long to die in the cold” hours before 911
164 was called to report Murphy was found in the snow. I do not claim to have the expertise
165 to unequivocally determine whether this search preceded the 911 call, but at a
166 minimum, this should have been more thoroughly investigated and Morrison should
167 have been treated as a potential suspect.

168 Add to that a parade of unprofessional conduct and comments from officers,
169 particularly from the lead investigator, and the case has morphed into a genuine public
170 scandal. In the messages Mankiewicz posted to a group chat in the days after the
171 investigation began, Mankiewicz not only denigrated Snow with inappropriate language
172 and slurs, but more importantly, Mankiewicz made comments calling into question the
173 objectivity of the Sheriff’s Department’s investigation. Mankiewicz posted, for example,
174 that “it would make it easier on everyone if [Snow] would just kill herself.” And when one
175 of the other members of the group chat suggested that the owner of the home should be
176 treated as a potential suspect, Mankiewicz responded, “nope, he’s a cop too.”

177 As I discussed previously, particularly in the early stages of the investigation, a
178 well-trained, effective investigator will treat every witness as a potential suspect.
179 Conversely, any decent investigator will avoid jumping to any hasty conclusions as to
180 the identity of the perpetrator. This not only erodes public trust in law enforcement by
181 giving the appearance of a biased investigation, but it harms the efficacy of the
182 investigation itself. Investigators that focus their investigation on one potential
183 perpetrator, and put blinders on as to other potential suspects, tend to only seek out
184 evidence that back up their predetermined theory and will fail to document other

185 material evidence at this scene that does not fit with their theory of events. This certainly
186 appears to be the case here with Mankiewicz's inexcusable failures to secure and
187 investigate the Stone house for potential evidence and to separate and properly
188 interrogate other witnesses at the scene.

189 It doesn't help any of these optics that Stone's wife sent a text message to
190 Mankiewicz saying that she wanted to send Mankiewicz "a gift" after the investigation
191 was over. And despite having relationships with several witnesses, Mankiewicz
192 remained on the case.

193 Although initially a topic of investigation, I am not critical of Mankiewicz's
194 treatment of DNA evidence in this case. Although trace evidence was collected in solo
195 cups and sandwich bags, the DNA and hair evidence in this case was properly collected
196 in normal evidence containers, and the chain of custody was properly documented as a
197 result. The difference in collection methods between the trace evidence and the DNA
198 and hair evidence may be explained by the fact that the DNA and hair evidence were
199 likely collected after Snow's SUV had been impounded, when an evidence collection kit
200 was available. I am aware that the DNA testing occurred after Mankiewicz had visited
201 the morgue. However, detectives routinely make their way to the morgue before DNA
202 testing has been formally initiated, and this is not a violation of proper police procedure.

203 I am not aware of any evidence to suggest any specific person was involved in
204 Murphy's death other than potentially the Defendant, Karen Snow. I am not aware of
205 any evidence that exists that Detective Mankiewicz's team failed to discover. I do not
206 have any specific reason to believe that any of the evidence collected by Detective
207 Mankiewicz's team was lost, contaminated, or tampered with, despite Detective

208 Mankiewicz's unconventional collection methods. I am not aware of any support for the
209 theory that Detective Mankiewicz's team fabricated evidence and have no reason to
210 suspect the broken pieces of Snow's taillight were planted on the crime scene. I have
211 no specific concerns regarding the testimony of witnesses and have not identified any
212 particularly concerning changes in witness accounts over time despite the lack of proper
213 sequestration. Although I am deeply troubled by the way in which this investigation was
214 conducted, I am skeptical of conspiracy theories surrounding police involvement in this
215 case and am hesitant to conclude that Detective Mankiewicz or any other member of
216 the police department acted in bad faith during the course of their investigation.

217 I am providing testimony in this matter within the scope of my role as a Police
218 Procedures Expert Investigator with the U.S. Department of Justice. I am not receiving
219 any payment from Snow or her defense counsel for my investigation of this matter or my
220 testimony in connection with this case.

221 I have carefully reviewed this statement. It is true and accurate, and it includes
222 everything that I know of that could be relevant to the events I discussed. I understand
223 that I can and must update this statement if anything new occurs to me before the trial.

224

225 By: *Nevada Morales*



226 Nevada Morales

Safari history

Take from other devices

Clear browsing data

Saturday, February 11, 2023

- 6:00 AM  How long to die in the cold? - Google https://www.google.com/search?sca_e...
- 2:30 AM  How long to die in the cold? - Google https://www.google.com/search?sca_e...

Friday, February 10, 2023







- 1:39 PM  college football games today - Google <https://www.google.com/search?q=colle...>
- 12:05 PM  Facebook Login <https://www.facebook.com/login>
- 12:03 PM  Facebook <https://www.facebook.com/>
- 11:18 AM  French dip sandwich recipes - Google <https://www.google.com/search?q=fren...>
- 11:00 AM  Pueblo weather forecast - Google <https://www.google.com/search?q=pueblo+...>
- 9:27 AM  Twitter <https://www.twitter.com/>

EXHIBIT 2
Pueblo Office of the Medical Examiner

REPORT OF INVESTIGATION BY CORONER

DECEDENT: John Murphy RACE: W SEX: M AGE: 34

HOME ADDRESS: 600 Fairway dr., Pueblo OCCUPATION: police officer

TYPE OF DEATH: Violent Casualty Suicide Suddenly when in apparent health
(check one only)
Found dead In Prison Suspicious, unusual or unnatural Cremation

COMMENT: found in front yard of Stone's residence - covered in snow

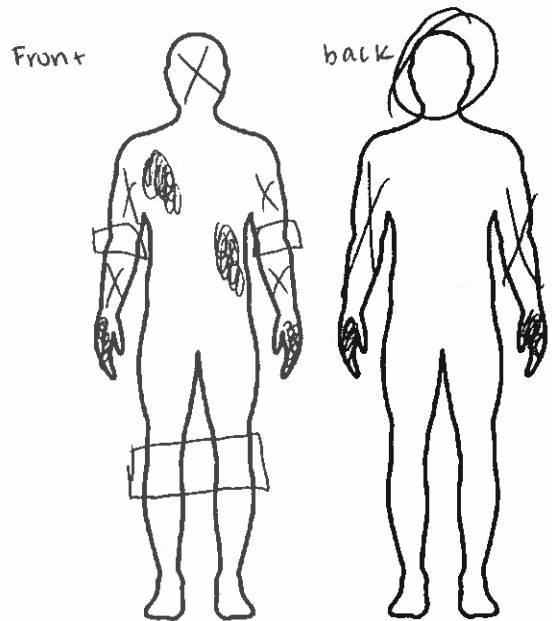
NOTIFICATION BY: Sgt. Phillip Stone INVESTIGATING AGENCY: Pueblo PD

DESCRIPTION OF BODY: Clothed Unclothed Partly clothed

Eyes: black Hair: brown Mustache: _____ Beard: _____
Weight: 210 Length: 5' 10" Body temp: 35.7°F Date and time: 2/11/23 9:07 am

MARKS AND WOUNDS: _____

- skull fracture - back of head
- lacerations on arms and face
- bruising on back of hands
- bruising on upper body
- scratches on arms and face
- reddish/brown discoloration near knees
elbows → frost erythema



PROBABLE CAUSE OF DEATH

MANNER OF DEATH

DEPOSITION OF CASE

blunt force trauma to the skull	Accident <input type="checkbox"/> Natural <input type="checkbox"/>	1. Not a medical examiner case <input type="checkbox"/>
	Suicide <input type="checkbox"/> Unknown <input checked="" type="checkbox"/>	2. Autopsy requested <input checked="" type="checkbox"/> No Autopsy ordered <input checked="" type="checkbox"/> No
	Homicide <input type="checkbox"/> Pending <input type="checkbox"/>	Pathologist: _____

I hereby declare that after receiving notice of the death described herein I took charge of the body and made inquiries regarding the cause of death in accordance with Colorado Code and that the information contained herein regarding such death is true and correct to the best of my knowledge and belief.

Date: 2/11/23 Signature of Medical Examiner: [Signature]

EXHIBIT 3

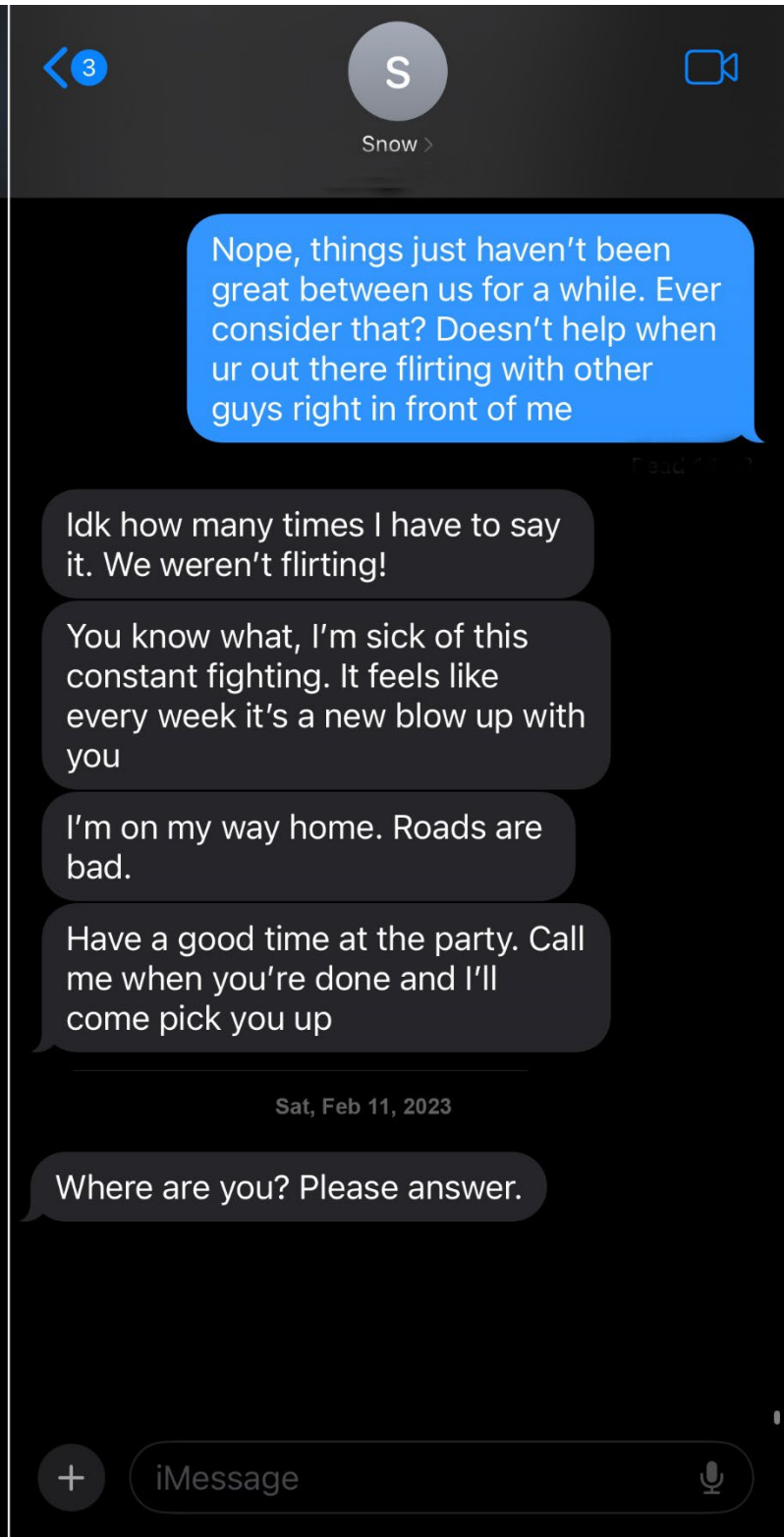
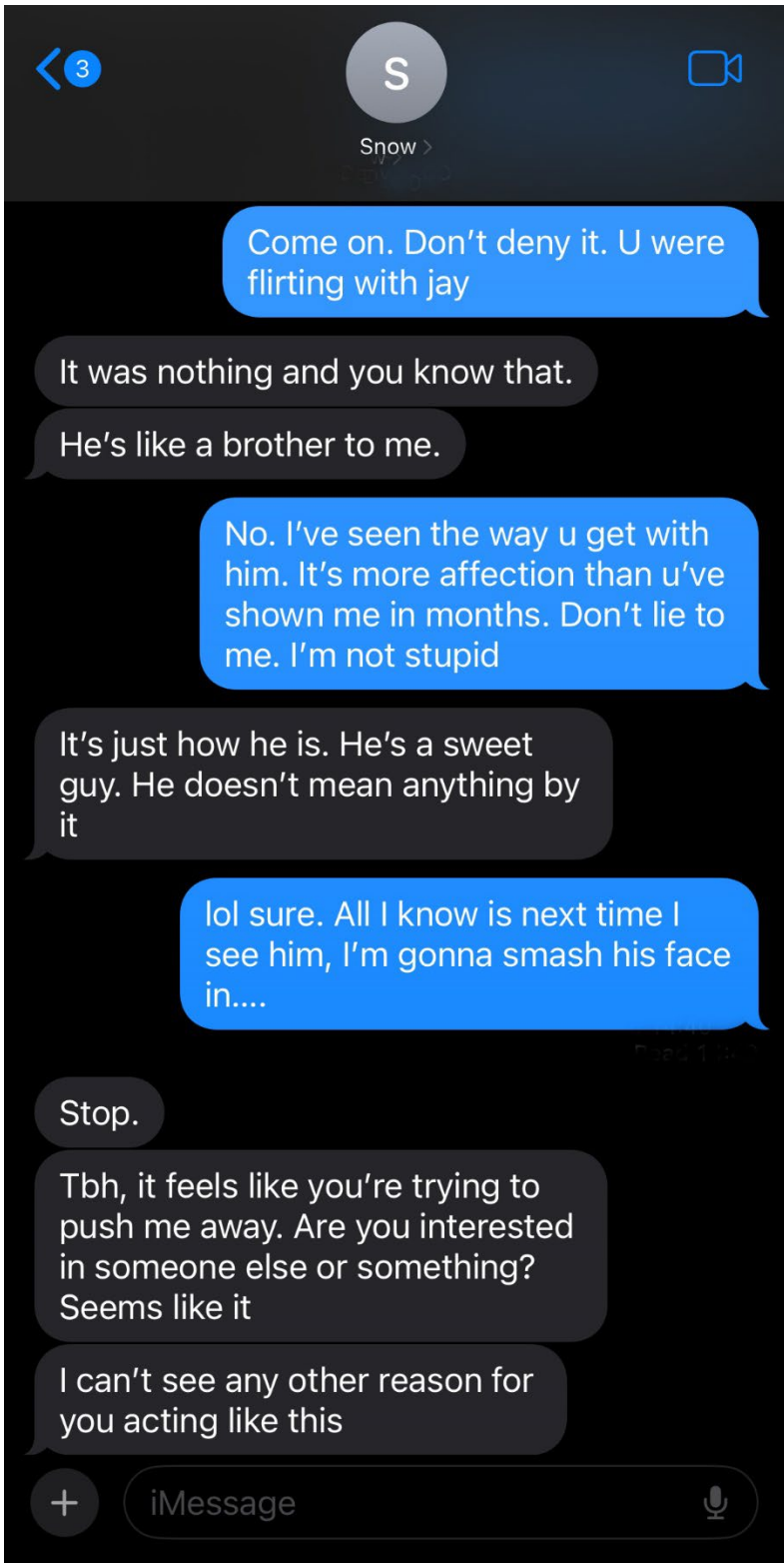


EXHIBIT 4

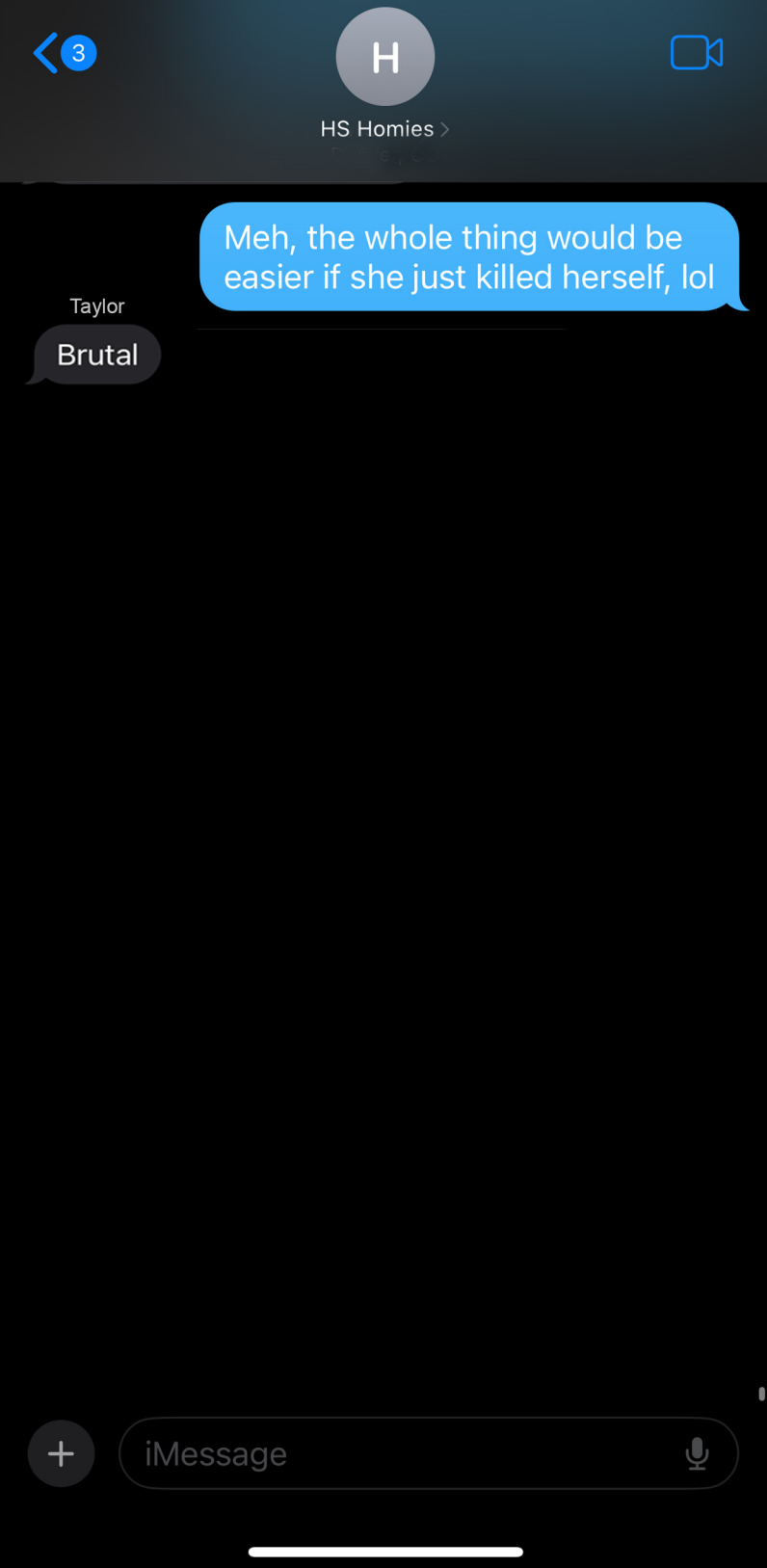
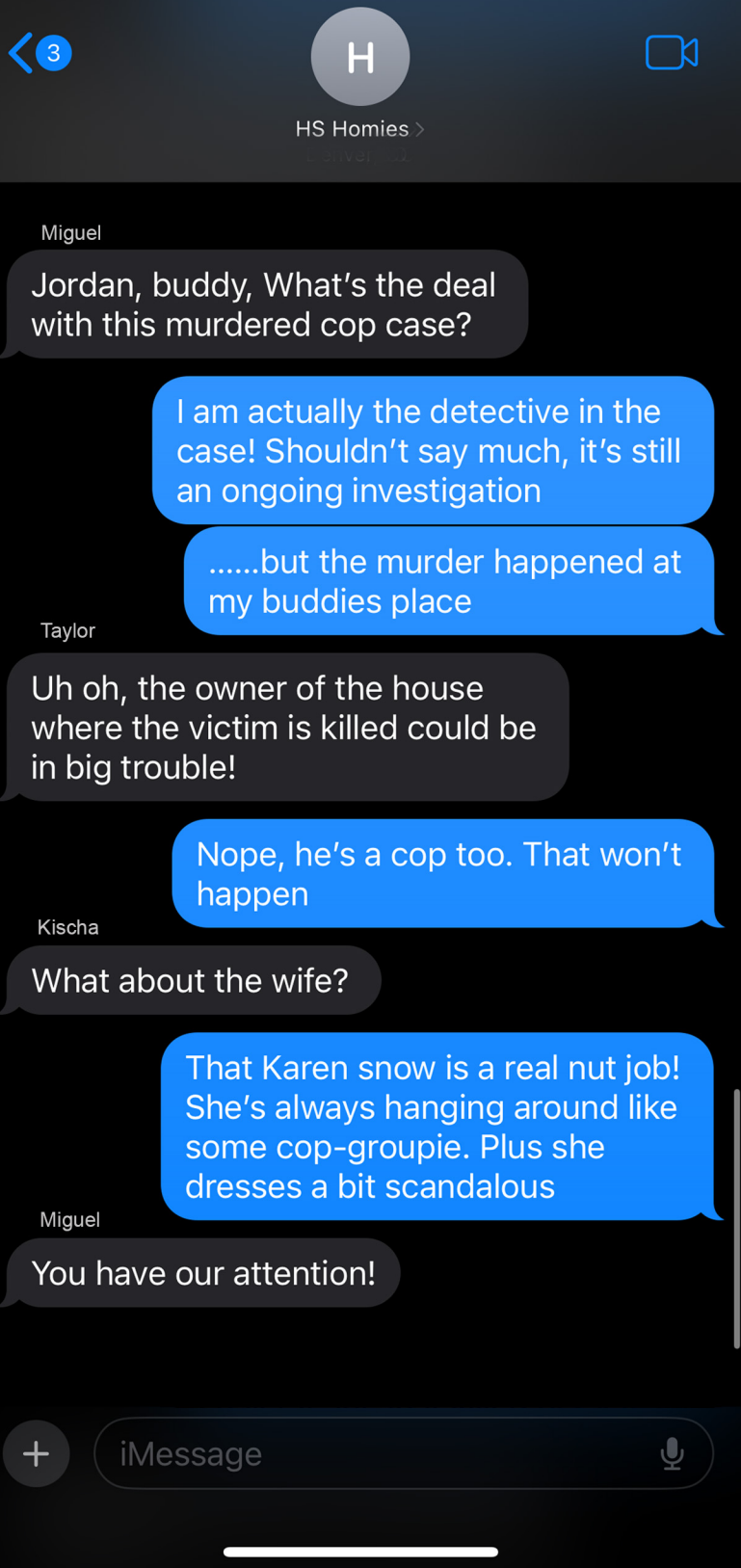


EXHIBIT 5



U.S. Department of Justice
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Office of the Assistant Director
Professional Responsibility & Security Operations
Internal Affairs Division
Washington, DC 20226

NOTICE OF TEMPORARY SUSPENSION PENDING INTERNAL AFFAIRS INVESTIGATION

Agent Edgar Jay
Denver III Field Office
950 17th Street, Suite 1700
Denver, Colorado 80202

Dear Mr. Jay,

This is notice of your temporary suspension from duty as a Field Agent of the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”).

The purpose of the suspension is to enable the Office of Professional Responsibility and Security Operations, Internal Affairs Division (“IAD”) to investigate allegations of misconduct made against you during the apprehension and arrest of a suspect on June 1, 2020. It is alleged that you have violated the Uniform Standards of Ethical Conduct for Employees of the Executive Branch (5 C.F.R. 2635.101(b)), and the Department of Justice regulations concerning ethics (5 C.F.R. 735.203).

Your suspension begins from the receipt of this letter and shall continue until final determination of the IAD. This suspension is not a disciplinary action. You must not discuss the investigation with anyone, and you cannot use any government equipment, including government vehicles and computer systems, in any way. You must surrender any government issued firearms and your ATF credentials to your field supervisor immediately.

Sincerely yours,

Kristen de Tineo, *Assistant Director*
Office of Professional Responsibility
and Security Operations
99 New York Avenue, NE
Washington, DC 20226

EXHIBIT 6

CURRICULUM VITAE CHASE MELVIN

1970 Lovell Avenue, Suite 417
Colorado Springs, CO
(719) 555-1876
cmelvin@hsmt.colorado

EDUCATION

BS, Computer Science & Biology, Indiana University Bloomington, 2006; MS, Biological Science, University of Minnesota Twin Cities, 2009.

PROFESSIONAL EXPERIENCE

Forensic Evidence Analytics, Inc., Colorado Springs, CO, 2009-present

- Owner, 2022-present
- Senior Crime Lab Technician, 2021-present
 - Process biological and forensic technological evidence on behalf of clients in a variety of matters, including criminal investigations and prosecutions involving fraud, money laundering, robbery, and homicide, as well as civil trade secret litigation and corporate audits.
 - Specialize in forensic analysis of mobile device metadata and cell tower data, vehicle event recorder data, and forensic imaging of computer hard drives, as well as analysis of biological evidence including DNA from skin, fingernail, and hair samples.
- Associate Crime Lab Technician, 2014-2021
 - Assist Senior Crime Lab Technicians in processing biological and forensic technological evidence in a variety of matters including fraud, criminal prosecutions, and civil trade secret litigation.
 - Ensure proper recordkeeping to establish chain of custody of biological samples and preserve integrity of forensic metadata.
- Assistant Lab Technician, 2009-2014
 - Organize and maintain tools and equipment used by lab personnel, assist lab personnel in processing biological and forensic technological evidence.
 - Maintain records of evidence collected and sent to lab for processing.

Hennepin County Forensic Science Lab, Minneapolis, MN

- Crime Lab Intern, Summer 2006; Summer 2007; Summer 2008

PUBLICATIONS

“Best Practices in Collecting, Storing, and Processing Forensic Metadata,” *Journal of Forensic Sciences*, vol. 75, no. 9 (Spring 2021)

“The Glove, Revisited: A Retrospective of the O.J. Simpson Murder Investigation,” *American Journal of Criminal Justice*, vol. 53, no. 1 (Fall 2016)

“Opening the Black Box: The Surprising Potential of Event Data Recorders in Helping Solve Violent Crimes,” *The Computer & Internet Lawyer*, vol. 45, no. 7 (Spring 2014)

MEMBERSHIPS

National District Attorneys Association, Allied Professional Member, 2022-present

Forensic Expert Witness Association, At-Large Member, 2020-present

American Academy of Forensic Sciences, At-Large Member, 2009-present

EXPERT TESTIMONY – PAST FIVE YEARS

Labyrinth, LLC v. James Hanson, N.C. Business Court, Mecklenburg County (2023)

- Provide expert analysis and report for plaintiff regarding fabric fiber samples in a trade secret misappropriation dispute between puppet manufacturer and former employee.

State of Colorado v. Verstappen, Colorado District Court, Pueblo County (2021)

- Provide expert analysis and report for prosecution regarding event recorder data pulled from suspect’s vehicle after road rage incident resulting in death.

United States v. Zuckenbuck, U.S. District Court for the Northern District of California (2021)

- Provide expert analysis and report for defense regarding forensic metadata from defendant’s smart phone in money laundering case.

State of Colorado v. Crick, et al., Colorado District Court, Pueblo County (2020)

- Provide expert analysis for prosecution regarding Y-STR genotyping of DNA evidence from crime scene demonstrating match between sample and suspect in case involving alleged murder-for-hire scheme.

Rock v. Smith, Colorado District Court, Denver County (2019)

- Provide expert analysis and report for plaintiff regarding broken champagne glass recovered from scene in civil battery case.

EXHIBIT 7

Vehicle Event Data Report

Event Details:

- **Date of Incident:** February 11, 2023
 - **Location of Triggering Event:** Approximately 36 miles prior to impoundment
 - **Vehicle:** Black Lexus SUV
-

Distance Analysis

- **Estimated Distance from Homicide Scene to Defendant's Residence:**
 - **Total Distance:** 36.1 to 38.8 miles
 - **Distance Traveled Post-Trigger Event:**
 - **Recorded Distance:** 36 miles
-

Triggering Event Recorded:

- **Initial Vehicle Movement:**
 - **Action:** Vehicle moved forward slightly
 - **Duration:** 3.13 seconds
 - **Reverse Shift:**
 - **Action:** Shifted to reverse
 - **Duration:** 8.29 seconds
 - **Acceleration:**
 - **Speed Increase:** Accelerated to 24.2 mph
 - **Duration:** 0.52 seconds
 - **Subsequent Speed Drop:**
 - **Speed Decrease:** Dropped to 15.6 mph
 - **Duration:** 1.3 seconds
 - **Steering Input:**
 - **Action:** Slight jostle of the steering wheel
-

Analytical Summary:

- The rapid fluctuations in vehicle speed and steering position indicate potential collision activity. The timing and nature of these changes suggest an impact.

EXHIBIT 8

6:47

4G

[Edit](#)

All

Missed

Recents

John Snow
mobile

5:06

John Snow
mobile

5:05

John Snow
mobile

5:04

John Snow
mobile

5:03

John Snow
mobile

5:02

John Snow (2)
mobile

5:00



John Snow
mobile

12:24



Favourites



Recents



Contacts



Keypad



Voicemail

EXHIBIT 9

London Holt, Ph.D., P.E.
Biomedical Engineer & Forensics Expert
Denver, Colorado

I. Summary

Biomedical engineer with over 20 years of experience in forensic analysis, specializing in biomechanics, data assessment, and high-speed accident analysis. Proven expertise in evaluating cellular and vehicle data in both civil and criminal cases. Published author in leading journals and certified BOSCH data retrieval specialist. Retained as an expert by plaintiffs, civil defendants, insurance companies, and criminal defense teams.

II. Education

- **Ph.D. in Biomedical Engineering**
University of Colorado, Boulder, CO | 2000
 - Internship: Boulder County Coroner's Office
 - **B.S. in Mathematics**
Stanford University, Stanford, CA | 1992
 - **B.S. in Computer Science**
Stanford University, Stanford, CA | 1992
-

III. Professional Experience

Private Forensics Expert

Holt Forensics LLC, Denver, Colorado | 2006 – Present

- Founded and operate a private forensics firm providing expert investigations and opinions in both civil and criminal cases.
- Conduct in-depth analyses of cellular data, EDR data, and biomechanics in accident reconstructions.
- BOSCH certified data retrieval technician and specialist.
- Published articles on GPS accuracy and EDR tracking in *Collision Magazine*.
- Retained by plaintiffs, defendants, and insurance companies for expert testimony and consulting in cases involving motor vehicle collisions and data analysis.

Assistant Professor, Biomedical Engineering & Computer Science

University of Southern California, Los Angeles, CA | 2000 – 2005

- Taught undergraduate and graduate courses in biomedical engineering and computer science.
- Supervised student research projects and served on thesis committees.
- Published a study on high-speed motor vehicle and pedestrian accidents in *Nature Biomedical Engineering*.

Intern

Boulder County Coroner's Office, Boulder, CO | 1995 – 2000

- Assisted in forensic investigations and autopsies.
 - Gained hands-on experience in post-mortem analysis and injury pattern recognition.
-

IV. Publications

- Murray, A. and Holt, L. "High-speed Motor Vehicle and Pedestrian Accidents." *Nature Biomedical Engineering*, 2004.
 - Holt, L. "Accuracy and Pitfalls EDR Tracking Data." *Collision Magazine*, 2012.
 - Holt, L. "Pinpoint: Assessing the Accuracy of the Emerging Practice of Wi-Fi Cell Phone Tracking Versus Cell Tower Tracking." *Collision Magazine*, 2018.
-

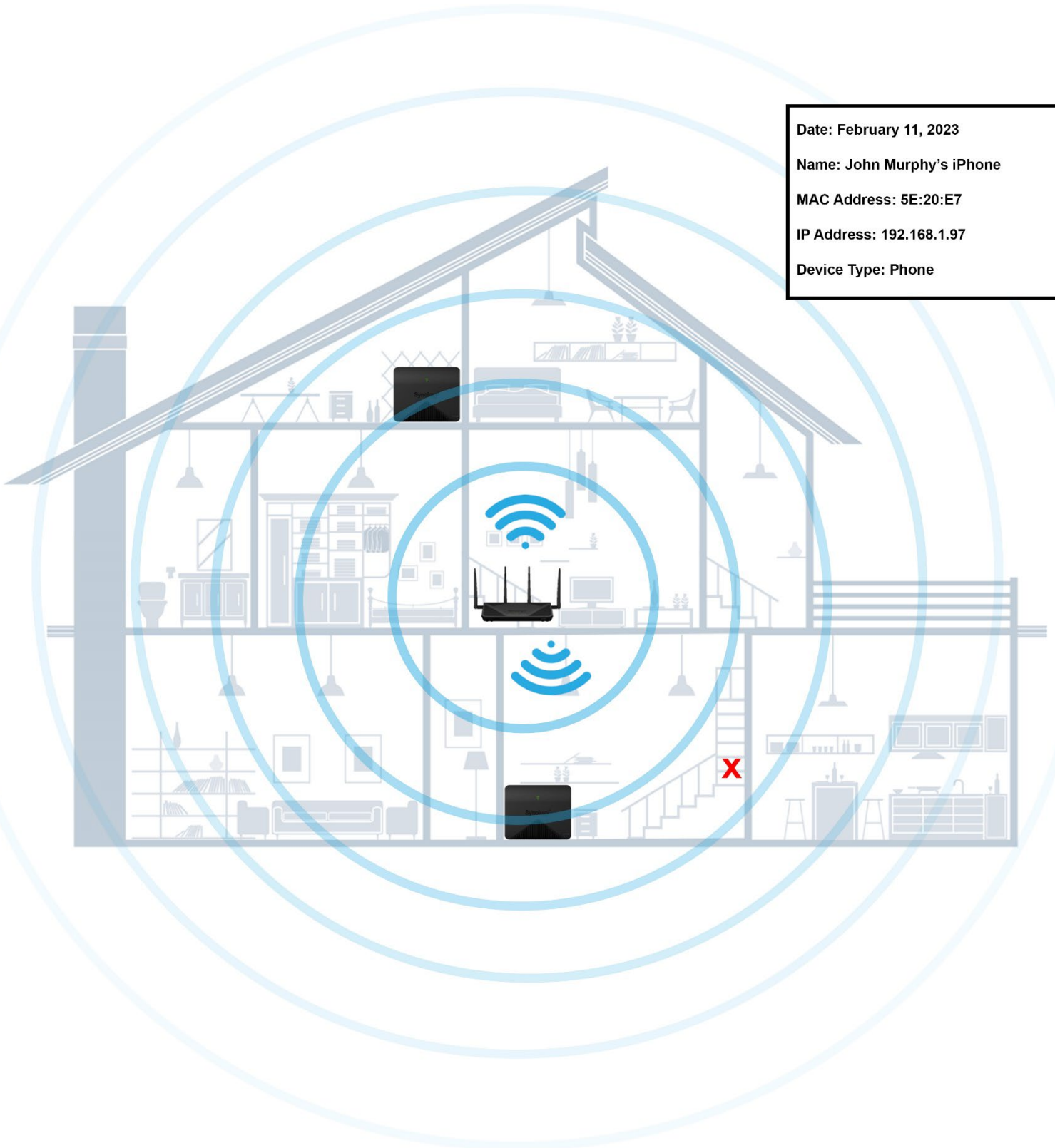
V. Licenses & Certifications

- **Professional Engineer (P.E.)** | Colorado, 2001
 - **Certified Data Retrieval Technician & Specialist** | BOSCH
Certification in extracting and analyzing EDR data from various vehicle makes and models.
 - **H-11 Advanced ISP–EDL–JTAG Cell Phone Data Recovery** | NICCS
Specialized training in advanced techniques for extracting data from cell phones using ISP, EDL, and JTAG methods.
-

VI. Technical Skills

- **Data Analysis:** Cellular data, EDR (Event Data Recorder) analysis, GPS tracking.
- **Programming Languages:** Python, MATLAB, R.
- **Forensic Tools:** BOSCH CDR Tool, GPS and cellular data mapping software.

EXHIBIT 10



Date: February 11, 2023
Name: John Murphy's iPhone
MAC Address: 5E:20:E7
IP Address: 192.168.1.97
Device Type: Phone

EXHIBIT 11

Nevada Morales
123 Justice Way
Pueblo, CO 81001
(720) 123-4567
nevada.morales@email.com

Education

Doctor of Medicine (MD)

University of California, Los Angeles (UCLA)
Graduated: 1980

Master of Arts in Criminal Justice

California State University
Graduated: 1978

Bachelor of Science in Criminal Justice

University of Southern California
Graduated: 1975

Certifications

- Certified Medical Investigator (Physician's Level)
 - Police Force Instructor
 - Crime Scene Investigation Certification
 - Advanced Criminal Investigation Certification
-

Professional Experience

U.S. Department of Justice

Police Procedures Expert Investigator
Pueblo, Colorado
January 1993 – Present

- Conduct comprehensive investigations involving police procedures and practices for federal cases.
- Collaborate with law enforcement agencies to develop best practices for crime scene management and police use of force.
- Provide expert testimony in federal court on criminal procedures and investigations
- Lead annual training seminars for federal and state law enforcement personnel on crime scene investigation techniques.

Los Angeles Police Department

Officer-in-Charge, Special Investigation Units
January 1981 – December 1992

- Directed major investigative units, including Homicide Special and Robbery-Homicide Divisions.

- Oversaw complex investigations involving homicides, kidnappings, and organized crime.
- Worked collaboratively with the FBI Violent Crime Task Force, enhancing inter-agency communication and effectiveness.
- Developed and implemented training programs for new detectives in investigative techniques and case management.

Criminal Justice Training Center

Police Academy Director

January 1975 – December 1980

- Led curriculum development and training for police academy recruits
- Focused on ethical policing, community engagement, and effective crime prevention strategies.
- Facilitated workshops and seminars on police labor issues, including hiring, retention, and termination processes.

Presentations and Publications

- Annual Presenter, Criminal Investigator Training Program, U.S. Department of Justice (2018 – present)
Topics: Crime Scene Investigation, Police Best Practices, Use of Force
- Featured Commentator, “Reasonable Doubt” Documentary (2024)
Focus: Police Investigative procedures during homicide investigations.

Skills

- Major Crime Scene Management
- Complex Investigation Techniques
- Police Policy Development
- Law Enforcement Training & Mentorship
- Public Speaking & Presentation Skills
- Inter-agency Collaboration

Professional Affiliations

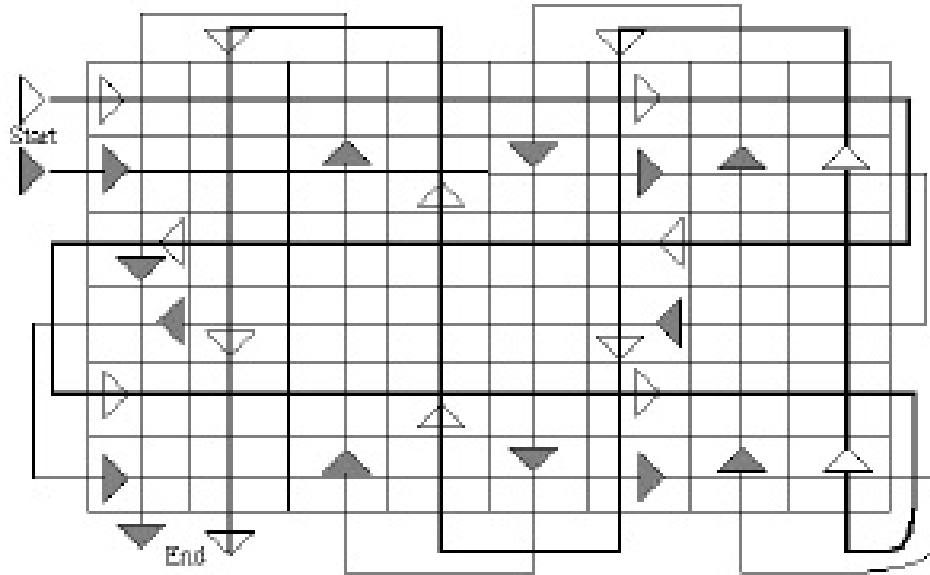
- International Association of Chiefs of Police (IACP)
- American Academy of Forensic Sciences (AAFS)
- National Criminal Justice Association (NCJA)

References

Available upon request.

EXHIBIT 12

Grid Method of Searching Crime Scene



Strip Method of Searching Crime Scene

