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

STATE OF ARIZONA,

Plaintiff,

v.

GERMAYNE CUNNINGHAM,

Defendant.

No. CR 2017-006221-001

NOTICE OF EXHIBITS

**MOTION TO DISMISS FOR
PROSECUTORIAL MISCONDUCT,
DUE PROCESS VIOLATION(S),
BRADY VIOLATION(S), AND
RULE 15 DISCLOSURE
VIOLATION(S)**

(Hon. Patricia Starr)

Germanye Cunningham, through Undersigned Counsels, submits this Notice of Exhibits for Defendant's Motion to Dismiss, for Prosecutorial Misconduct, Due Process Violation(s), Brady Violation(s), and Rule 15 Disclosure Violation(s). The following exhibits are attached:

EXHIBIT A: Internal Affairs Interview Detective Yeo

EXHIBIT B: Internal Affairs Interview Jennifer Calovini

EXHIBIT C: Internal Affairs Interview Andrea Gamez

SUBMITTED this 10th day of March, 2026, by:

/s/ Taylor W. Fox
Attorney for Germanye Cunningham

/s/ Natalee Segal
Attorney for Germanye Cunningham

Copy of the foregoing E-filed this 10th day of March, 2026, to:

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EXHIBIT A

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Interview of Detective Noah Yeo
Administrative Investigation - AI2026-0001
January 23, 2026

Participants:

- SC – Sergeant S. Cannon
- LB – Lieutenant J. Bayer
- DY – Detective Noah Yeo

1 **SC:** All right, this is AI2026-0001 and my name is Sergeant Cannon, badge number
2 1155, and I am here with Lieutenant Bayer-

3 **LB:** Badge number 1208.

4 **SC:** -and Detective Noah Yeo-

5 **DY:** Badge number 1167.

6 **SC:** All right, so we're just going to start off with the NOI-

7 **DY:** Okay.

8 **SC:** I'm going to read this top portion to you. An administrative investigation is being
9 conducted in the allegations of misconduct and or operational actions in violation
10 of city and or department policy. It is believed that you may have information
11 regarding the following alleged incident. On January 14th, 2026 it was discovered
12 that items involving property and evidence and the packaging or handling of
13 evidence in case number 17-6390 may have been improperly handled. Um and
14 then I'll read the rest or you can read the rest of that. Just obviously the NOI states
15 who you can and cannot talk to. Um you also are entitled to a union rep if you
16 want someone with you. Did you want that?

17 **DY:** No.

18 **SC:** Okay.

19 **DY:** Am I going to get a copy?

20 **LB:** Yep, we're gonna-

21 **SC:** Yes, absolutely.

22 **DY:** Okay, that's fine.

1 **LB:** -give you a copy as well.

2 **SC:** Yep.

3 **DY:** Yeah.

4 **LB:** So the big thing we just reiterate is you're, obviously with the-

5 **SC:** Confidential-

6 **LB:** -actual case if you have to talk about stuff that's is what it is but internally-

7 **SC:** Uh today is the-

8 **LB:** It's the 20-

9 **SC:** -23rd.

10 **LB:** -23rd.

11 **DY:** 23rd, okay.

12 **LB:** The admonishment at the bottom there talks about who you can speak to-

13 **DY:** Okay.

14 **LB:** -but obviously with the actual criminal case you have to be able to talk to-

15 **SC:** Thank you.

16 **LB:** -attorneys-

17 **DY:** Yeah.

18 **LB:** -and things like that so-

19 **DY:** Yep.

20 **SC:** Yeah. Okay.

21 **LB:** And we'll, we make a copy. We can scan one to you. Is that-

22 **DY:** That's, that's fine.

1 **LB:** -(INDISCERNIBLE)-

2 **SC:** Want me to email it to you?

3 **DY:** Yeah.

4 **SC:** Okay.

5 **DY:** Totally fine.

6 **SC:** Cool. All right, so let's just start off with you and how long have you been with

7 Goodyear?

8 **DY:** I've been with the Goodyear Police Department since 2008, September of 2008, so

9 approximately 18 and a half years.

10 **SC:** Okay. And what division do you work for?

11 **DY:** I work for the Special Victims Bureau-

12 **SC:** Okay.

13 **DY:** -which is the, inside the Criminal Investigations Bureau.

14 **SC:** Okay, and that contains, that, basically just describe that a little bit.

15 **DY:** Sure, so um inside the Criminal Investigations Bureau it's made up of different uh

16 sections. We have Major Crimes, we have Special Victims, we have Property

17 Crimes, um as well as I believe uh Crime Scene is also in the division um and

18 some civilian employees. But I'm part of the Special Victims and my primary job

19 is to deal with anything with sex crimes, child abuse crimes and adult crimes.

20 **SC:** Okay. And how long have you been doing that?

21 **DY:** I've been doing that since 2020 approximately.

22 **SC:** Okay.

1 **LB:** In that particular unit?

2 **DY:** Yes.

3 **LB:** As a detective?

4 **DY:** Yes.

5 **LB:** Have you been a detective longer than that or is-

6 **DY:** Yes, I've been a detective um since 2014 with the Criminal Investigations Bureau.

7 **LB:** Okay.

8 **DY:** So approximately 12 years.

9 **LB:** Okay.

10 **SC:** Good job, that's awesome.

11 **DY:** It's a long time.

12 **SC:** Yeah. Okay, so what we're talking about now is the case regarding uh 2017-6390

13 where you are currently in trial and you are dealing with evidence, right, back and

14 forth to court for prosecution and defense and all of that-

15 **DY:** Yes.

16 **SC:** -and can you just describe to me like how this all came about on January 14th?

17 **DY:** Yes. So and actually I would need to back up-

18 **SC:** Okay.

19 **DY:** -even further. Um I had a defense interview, um I believe it was in May of 2025-

20 **SC:** Okay.

1 **DY:** -um and they were, I've had a series of defense interviews in preparation for this
2 trial and these defense interviews con-, are conducted by obviously multiple
3 defense attorneys at the Maricopa County uh Attorney's conference room.

4 **SC:** Okay.

5 **DY:** Um and during this one particular defense interview, one of the attorneys, it may
6 have been Ms. Hamilton or Ms. Segal,-

7 **SC:** Okay.

8 **DY:** -was asking me questions about items 103 and 104. These particular items are um
9 cell phones belonging to both Ms., Mr. and Mrs. Cunningham.

10 **SC:** Okay.

11 **DY:** Lisa and Germayne Cunningham.

12 **LB:** Do you know which one is Lisa's or what, what item is 103?

13 **DY:** Yes-

14 **LB:** Do you know what type of phone-

15 **DY:** -103 is a uh Blackberry.

16 **LB:** Okay.

17 **DY:** And it belongs to Germayne Cunningham.

18 **LB:** Okay.

19 **DY:** Item 104 is an iPhone um 6S and it belongs to Lisa Cunningham.

20 **SC:** Okay.

21 **DY:** And these cell phones were taken um, they were seized on February 12th of 2017
22 when this investigation first started at the Phoenix Children's Hospital.

1 **SC:** February 12th you said?

2 **DY:** Correct.

3 **SC:** Uh 20-

4 **DY:** 2017.

5 **LB:** Who seized them, you?

6 **DY:** Uh Dougal and then they were turned over to me.

7 **SC:** Okay.

8 **LB:** Okay.

9 **DY:** Um so fast forward um, well let me back up. So during this defense interview,
10 these particular phones got brought up in particular of the why does it show in the
11 chain of custody that on March 9th of 2017 um item 104 shows a 0100 sign out
12 time and then I believe part of the question too was then an additional, or no,
13 maybe it was just that in the beginning with this defense interview. And I said um
14 well I'd have to, I'd have to look into that. I, I'm not sure why it would show one
15 o'clock in the morning.

16 **SC:** Right.

17 **DY:** Um I can, I can tell you that I received the phones on March 10th, okay, at
18 approximately 1316 hours. And I received those from I believe was Ms. Raisor,
19 who has since been fired, Elizabeth Raisor, our old property, our, she was our old
20 property and evidence custodian.

21 **SC:** Okay.

22 **LB:** Okay, 1316 hours on March 10th?

1 **DY:** Correct.

2 **LB:** From Elizabeth Raisor?

3 **DY:** Correct. Um-

4 **LB:** Were you checking them out for a reason?

5 **DY:** Yes, I was checking them out because I had a signed search warrant to have these

6 phones uh forensically extracted and downloaded-

7 **LB:** Okay.

8 **DY:** -by Detective McCure.

9 **LB:** Okay.

10 **DY:** Okay? Um I took these phones which were sealed, signed from the initial time we

11 put them in back in February and I took them to Detective McCure and I believe

12 his chain of custody form shows 1330, so we're talking what-

13 **LB:** The time to drive from-

14 **DY:** -14 minutes or so-

15 **SC:** Mm hmm.

16 **DY:** -difference of when I had them and I gave them to Detective McCure-

17 **SC:** Okay.

18 **DY:** -in his paper chain of custody form. Um Detective McCure um extracted those

19 phones over the course of, I believe it was a day and a half, and then um, oh my

20 gosh, I'm sorry.

21 **SC:** You're fine.

22 **LB:** You're fine.

1 **SC:** It's a lot.

2 **LB:** These are very specific details.

3 **DY:** Yeah, yeah, yeah, yeah. Um-

4 **LB:** Is this documented somewhere?

5 **DY:** It is doc-, it's totally documented, yeah.

6 **LB:** Okay.

7 **DY:** It's all documented. Anyway-

8 **LB:** Is it in supps or in the chain of custody like-

9 **DY:** It's in both.

10 **LB:** Okay.

11 **DY:** Chain of custody and supps.

12 **LB:** So you pick it up from Elizabeth Raisor at P.D.?

13 **DY:** Yes.

14 **LB:** And you take it to-

15 **DY:** On March 9th.

16 **LB:** On, or March 10th?

17 **DY:** March 9th.

18 **SC:** The 9th.

19 **LB:** March 9th.

20 **SC:** At 13 something.

21 **LB:** 1316 hours but she had it signed out at what?

22 **DY:** Did I say March 10th? I'm sorry.

1 **SC:** No, you said that's-

2 **DY:** I, I think I did.

3 **LB:** I, I wrote down March 10th.

4 **DY:** Okay, so my, that's my fault.

5 **SC:** Oh yeah.

6 **LB:** Okay, so March 9th-

7 **DY:** I did, I did get them March 9th-

8 **LB:** Okay.

9 **DY:** -at 1316 hours-

10 **LB:** Okay.

11 **DY:** -and maybe that's where I was confusing myself.

12 **LB:** But she signed them, she, so she signed them out March 9th at one in the morning-

13 **SC:** That's what the-

14 **LB:** 0-, 0100.

15 **DY:** Correct.

16 **SC:** That's what the-

17 **LB:** Okay.

18 **DY:** But-

19 **SC:** -system shows.

20 **DY:** Correct. But then I, after this defense interview, I went, I went back to Andrea and

21 I said Andrea, why does it show a 0100-

22 **SC:** Yeah.

1 **DY:** -timeframe and she says, and this was shortly after the defense interview.

2 **SC:** And this was in-

3 **DY:** I don't remember what date it was.

4 **SC:** -person, right?

5 **DY:** This was in person.

6 **SC:** Uh huh.

7 **DY:** And I said why does it show 0100 on here and she says oh I don't know. Maybe it

8 was uh maybe it was her fat fingering the, the time.

9 **SC:** Okay.

10 **DY:** Okay? And I'm going-

11 **SC:** Me-, her meaning Elizabeth-

12 **DY:** Elizabeth.

13 **SC:** -fat fingering it?

14 **DY:** Elizabeth-

15 **SC:** Okay.

16 **DY:** Yeah not Andrea.

17 **SC:** Mm hmm.

18 **DY:** Um and I'm going okay, you know?

19 **LB:** Do you know who the supervisor was at that time?

20 **DY:** It would have been Lori I believe.

21 **SC:** Mm hmm.

22 **LB:** And you went to Andrea back around this time.

1 **SC:** Well this was in '25.

2 **DY:** Oh, oh, oh-, yes, yes I went to Andrea. So after the defense interview-

3 **LB:** Okay.

4 **DY:** -uh I don't remember exactly what date it was.

5 **SC:** Mm hmm.

6 **DY:** I actually was in there for I think putting other evidence in and I said, it hit me like

7 oh I need to ask Andrea about this, because I knew I had a follow up defense

8 interview-

9 **SC:** Mm hmm.

10 **DY:** -that I wanted to clarify it to them-

11 **SC:** Oh-

12 **LB:** On why this time was-

13 **DY:** -what was going on.

14 **LB:** -diff-, incorrect.

15 **DY:** Yes. And so I told Andrea and she says the oh it must have been fat fingered and I,

16 I, I'm not-

17 **LB:** So like it's like-

18 **DY:** -really sure-

19 **LB:** -1300 at, it was 0100 or-

20 **DY:** She, I think she literally said-

21 **LB:** -or a.m. p.m.-

1 **DY:** -1300 you know? And I'm, and so I was kind of like oh like it kind of makes
2 sense, right?

3 **SC:** Mm hmm, yeah.

4 **DY:** Um it's close. Maybe-

5 **SC:** Yeah.

6 **DY:** -maybe it happened that way.

7 **SC:** Okay.

8 **DY:** Anyway, so I go to my, oh I go to, and I look through the chain of custody and I s-,
9 oh the other question that the defense had was why does John turn the phones in
10 on the 10th, okay, in the afternoon of the 10th, okay? So John had them from the
11 9th-

12 **SC:** Mm hmm.

13 **DY:** -through the 10th-

14 **SC:** Okay.

15 **DY:** John turns them into P and E and they say why in the world does it show that the
16 phones were entered on the 13th-

17 **SC:** What?

18 **DY:** -when John entered them on the 10th?

19 **SC:** Okay.

20 **DY:** And I said well that's easily explainable because John turned them in on a Friday.
21 So the 10th, March 10th was a Friday and he turned them in, I want to say, late
22 afternoon-

1 **SC:** So it didn't get-

2 **DY:** -which means that P and E was not even there, okay-

3 **SC:** Mm hmm, mm hmm.

4 **LB:** Okay, so they get logged back in, they're in, they presumably sit in a locker-

5 **DY:** Correct.

6 **SC:** The phones do, yeah.

7 **LB:** -an evidence locker, waiting to be officially logged back in.

8 **DY:** Exactly.

9 **SC:** Yeah, yeah.

10 **LB:** Okay.

11 **DY:** So they were officially logged back in on the 13th by, again, Elizabeth Raisor-

12 **SC:** Okay.

13 **DY:** -at 11-ish o'clock in the, in the morning, okay?

14 **SC:** Okay. That makes sense.

15 **DY:** Yep. So-

16 **LB:** Did the defense, did that seem like a satisfactory-

17 **DY:** Correct-

18 **LB:** -response?

19 **DY:** -yes. And I explained this to the defense on a follow up defense interview and they

20 kind of, yeah, everything kind of seemed kosher, whatever, at least, I don't know.

21 It seemed that way.

22 **SC:** Yeah.

1 **DY:** I don't know what they were thinking.

2 **SC:** Mm hmm.

3 **DY:** Okay, so now we're in, now we're in trial.

4 **LB:** Okay, can I pause you one second?

5 **DY:** Yeah, yeah, yeah.

6 **LB:** The, the discrepancy with the 0100 sign out time versus the 1316 when you

7 actually-

8 **DY:** Mm hmm.

9 **LB:** -got them, was that, do you know if that was ever resolved? 'Cause you brought

10 this to Andrea-

11 **DY:** It was-

12 **LB:** -did they correct it or go back through any logs and try to figure out was there

13 anything done to document like why this may have occurred? But Elizabeth Raisor

14 is already gone.

15 **DY:** There was nothing that I saw in the system that was changed-

16 **LB:** Okay.

17 **DY:** -from-

18 **SC:** Did it go beyond-

19 **DY:** -what I saw.

20 **SC:** -did Andrea take it, the concern to anybody else?

21 **DY:** Correct. I have no clue.

22 **LB:** Okay.

1 **DY:** No clue.

2 **LB:** But she was aware that you found this like the check-out is at one in the morning
3 which Elizabeth Raiser I'm guessing didn't work at 1a.m. in property?

4 **DY:** And I did ask Andrea would there be any reason why someone would be in there
5 at one o'clock in the morning. I said I know you guys are busy.

6 **LB:** Yeah, and get called in or-

7 **DY:** Uh yeah, and you know, and she's like no, there's, there's just no way.

8 **LB:** Okay.

9 **DY:** I said okay.

10 **SC:** So this conversation happened in May not the 14th.

11 **DY:** Correct.

12 **SC:** Okay.

13 **DY:** Correct.

14 **SC:** Okay.

15 **DY:** So, all right so then um, what was it, okay so I, I tell the defense every se-,
16 everything seems to be fine. I, I kind of chalked it up to okay, well I think we have
17 this figured out, right-

18 **SC:** Yeah.

19 **DY:** -and I didn't really deep dive into the evidence-

20 **SC:** Yeah.

21 **DY:** -okay? Now we're in trial and John McCure is up, right? And he's talking about
22 his chain of custody times, they're producing his chain of custody forms in the

1 courtroom, they're showing pictures of the envelope and where he signed and
2 where-

3 **SC:** Okay.

4 **DY:** -and how he received it from me with my seal and my signature. Okay, everything
5 seems to be jiving. Then they skipped Kathy Enriquez. She was the second cell
6 phone extractor that we used to do the extraction and Dougal knew her. She was a
7 professional friend from Phoenix that he did some, some I guess uh he went to a
8 conference and got to know her or whatever.

9 **LB:** Okay.

10 **DY:** It was approved through command that we could send them to U.S.A. Forensics
11 with Kathy. She was the one who did the second extraction and-

12 **LB:** So this is after the March 9th extraction.

13 **DY:** Correct, and that was-

14 **LB:** Okay.

15 **DY:** -done on April 21st-

16 **SC:** Okay.

17 **DY:** -of 2017, the start of it, okay? So, but we skipped her as a witness because she's an
18 out of state witness-

19 **SC:** Mm hmm.

20 **DY:** -and they couldn't get her in time.

21 **SC:** Okay.

22 **DY:** So we went to Scott Keely who did the third extraction on the phones.

1 **SC:** Okay.

2 **LB:** And when was that?

3 **DY:** And he did that extraction, I want to say October of 2018, okay?

4 **LB:** October of 2018?

5 **DY:** And the reason I had him do the extraction was in August of 2017 I was in a de-, a
6 de-, uh deposition over the um the um, what do you call it, it was a Simpson
7 hearing and it was making this case a capital case-

8 **SC:** Okay.

9 **DY:** -so a death penalty case, which we were successful in doing. But one thing that
10 was brought up during this multi-day Simpson hearing was, and they got me to
11 agree to this, was that there was errors in the dates on Kathy's report, okay? The
12 reality was, me being a novice with cell phones and computer stuff, or cell phone
13 extraction stuff, with cell phones, when you delete data what will happen is it, it's
14 freeing up space on your phone, okay-

15 **SC:** Mm hmm.

16 **DY:** -and it rewrites. And when it rewrites it can issue a bunch of inaccurate dates and
17 times in your cell phone extraction.

18 **SC:** Oh.

19 **DY:** So it, it's a very common thing. I had no clue, okay?

20 **SC:** Gotcha.

21 **LB:** Okay. So you're looking at it and it's like well wow it's not-

22 **DY:** They're showing me why Noah does it show-

1 **LB:** Mm hmm.

2 **DY:** -this text message back in two, it was 2005, and I said I don't know.

3 **SC:** Mm.

4 **DY:** I have no clue. So it's an error.

5 **LB:** Yeah.

6 **DY:** Well, yeah it's an error. Well-

7 **LB:** It appears to be but I'm not the expert in-

8 **DY:** -it turns out-

9 **LB:** -examining a phone.

10 **DY:** -that's not an error. It's common and it's an inaccurate time, not an error, okay-

11 **LB:** Okay.

12 **SC:** Okay.

13 **DY:** -based upon the rewrites on the phones. I didn't know that, okay? I go back to

14 John McCure I think after the hearing and I said dude, like you know, what's up

15 with this and he goes oh, that's common. We, we get those all the time. I said oh,

16 okay.

17 **LB:** Right.

18 **DY:** So out of an abundance of transparency for the case I said, this was after um uh

19 that hearing in October, um it might have been like again, like 12th or 17th. I don't

20 know why those two dates stick out. I got an additional warrant to have the phones

21 extracted for the third time for transparency for this case, okay-

22 **SC:** Okay.

1 **DY:** -and that was through RMIN-

2 **SC:** Okay.

3 **DY:** -okay, and that is Scott Keely-

4 **SC:** Okay.

5 **DY:** -okay? So um yeah, nothing nefarious, nothing like that. It was a compu-, it was
6 just purely a transparency thing. Um-

7 **SC:** So each time this phone is being checked out?

8 **DY:** Yes. And there is chain of cust-

9 **SC:** And checked back in-

10 **DY:** -there is chain of custody to support-

11 **SC:** Every time.

12 **DY:** -every time-

13 **SC:** Okay.

14 **DY:** -and these dates and times. But that's where it gets weird.

15 **SC:** Okay.

16 **DY:** Um some of it can be, can be accounted for through um them being dropped off
17 maybe on an, in an afternoon and the following day they check it in, okay?

18 **SC:** Yeah.

19 **LB:** If it's, so after their regular hours-

20 **SC:** After their hours-

21 **DY:** Right.

22 **LB:** -it's gonna sit until-

1 **DY:** Right.

2 **SC:** Some of it but not all of it.

3 **DY:** Yes, and so okay let, I don't want to lose track here.

4 **SC:** Mm hmm.

5 **LB:** Okay so we skipped over yeah, extraction two.

6 **DY:** Yes, so we, so we, we get with s-, Scott testifies-

7 **SC:** Mm hmm.

8 **DY:** -Scott Keely, and when he's testifying they're, he's talking about his extraction,
9 everything else, chain of custody, whatnot, and they, and they show him the
10 envelope. It's on the, the deal too of hi-, the pictures he took prior to opening the
11 package and you can see my seal. You can see John's seal. You can see Kathy
12 Enriquez's seal. And at the very top there's an uninitialed or signed seal at the top
13 of the envelope, okay? They don't ask about that but I noticed it.

14 **SC:** Mm hmm.

15 **DY:** And I'm like-

16 **SC:** Yeah.

17 **DY:** -why is that there?

18 **SC:** Right.

19 **DY:** And why isn't it initialed and why, you know my brain is going like what the heck
20 is that about, okay?

21 **LB:** Attention to detail-

22 **DY:** Yeah.

1 **LB:** -seeing this is-

2 **DY:** Exactly.

3 **LB:** -we have everybody's tape is clear on whose-

4 **SC:** And initialed, yeah.

5 **LB:** -it is.

6 **DY:** Correct. And I'm going, and it's the candy cane style tape so it-

7 **SC:** Mm.

8 **DY:** -that was what-

9 **SC:** It stands out.

10 **DY:** -well and that was what we used back in, I believe-

11 **SC:** Yeah.

12 **DY:** -back in that timeframe.

13 **SC:** Mm hmm.

14 **LB:** So you recognize it as potentially Goodyear tape.

15 **DY:** Correct. And so-

16 **LB:** And it looked similar to what we used.

17 **DY:** So now I'm going what the heck, okay?

18 **SC:** Mm hmm. Had you seen that before-

19 **DY:** No.

20 **SC:** -the other times when you checked it out?

21 **DY:** No. No, well, well-

22 **SC:** Do you know what I'm, do you understand what I'm asking?

1 **DY:** Yeah, yeah, I do. Um I don't remember.

2 **SC:** Okay.

3 **DY:** I, I, I have no clue.

4 **SC:** Yeah.

5 **DY:** That was so long ago. I have no clue.

6 **SC:** Okay.

7 **DY:** This was the first time like a lightbulb went off in my head as I'm seeing this,
8 okay?

9 **LB:** Is there a picture of that somewhere?

10 **DY:** Yeah. I have it. I can show you guys.

11 **SC:** Okay.

12 **LB:** Yeah, would you mind pulling it up?

13 **DY:** Yeah, yeah.

14 **LB:** Just so we kind of know what you're-

15 **DY:** That's why I brought this.

16 **LB:** -ref-, it will help I think us for clarity.

17 **DY:** Yep.

18 **SC:** Did they mention it or was it just something that you noticed?

19 **DY:** They didn't mention it.

20 **SC:** Okay.

21 **LB:** Is it, is the phone, the one we're talking about, I guess we'll see in the picture, is it
22 in an envelope or is it-

1 **DY:** Mm hmm.

2 **LB:** -in a box?

3 **DY:** In an envelope.

4 **LB:** So each person that they carefully, I, I've never actually had to be the one opening
5 like they do in forensic, are they real-

6 **SC:** Right.

7 **LB:** -careful how they reopen the, how they cut the tape?

8 **DY:** Yes.

9 **LB:** And the document-

10 **DY:** Typically.

11 **LB:** -that they're cutting, the tape was all sealed?

12 **DY:** Yes, you're, you're gonna, you're gonna see what I'm talking about.

13 **LB:** Okay.

14 **DY:** Um okay so I guess what we can do is um, it will probably best if we just start
15 from Kathy's.

16 **SC:** Okay.

17 **DY:** So-

18 **SC:** Because every time somebody gets the phone and does their extraction they
19 photograph it prior to opening and after-

20 **DY:** Right, which-

21 **SC:** -they take it, right?

22 **DY:** -is genius, right?

1 **SC:** Yeah, absolutely.

2 **DY:** And clearly that's what helps with this situation, right?

3 **SC:** Mm hmm.

4 **DY:** So this is Kathy Enriquez's uh photos, okay?

5 **SC:** Okay.

6 **LB:** These are her photos?

7 **DY:** Yes, so there's my search warrant.

8 **SC:** Okay.

9 **DY:** But this is back in April, okay?

10 **SC:** Okay.

11 **DY:** There's the evidence foil and that's not a great picture but you'll see more.

12 **SC:** I could put it up there if we wanted.

13 **DY:** Um so she's doing the tag number, okay there's, there's my-

14 **SC:** Yours-

15 **DY:** -tape.

16 **SC:** -okay.

17 **LB:** When you originally-

18 **DY:** When I originally did it-

19 **SC:** Mm hmm.

20 **DY:** -with my seal, okay? Um there's John's.

21 **SC:** Okay.

22 **DY:** Oops, shit. There's John's seal where he took, he opened the package there-

1 **SC:** No candy cane.

2 **DY:** -removed the cell phone, no candy cane.

3 **SC:** Mm hmm.

4 **DY:** Um this is the other phone, okay? That's why it looks like it's in a-

5 **SC:** Oh okay.

6 **DY:** -different spot.

7 **LB:** Mm hmm.

8 **SC:** Okay.

9 **DY:** There's one of the phones in foil. Another one. So there's Germaine's phone. So

10 as you can see, there's no candy cane tape yet-

11 **SC:** No.

12 **DY:** -okay? I wish Kathy would have taken pictures of it when she was done-

13 **SC:** Mm hmm.

14 **DY:** -um but she didn't.

15 **SC:** And she taped it at her location or-

16 **DY:** There's Lisa's phone. Yeah, she taped it at her location.

17 **SC:** Okay.

18 **DY:** Okay, so the reason I'm showing this is 'cause I want you guys to see that at this

19 point in time there's no candy cane tape.

20 **SC:** No.

21 **DY:** You saw my seal. You saw John's seal, okay?

22 **LB:** Mm hmm.

1 **DY:** Here's, this is Scott's. Now this is in 2018, October of 2018. Um let's see here,
2 intake, okay. So at the top of 104, this is Lisa's phone-

3 **LB:** Okay I see it.

4 **DY:** -you now have this tape up here, okay?

5 **LB:** Okay.

6 **DY:** And so again, as I'm sitting in trial I'm going how come-

7 **LB:** When did that tape go on there.

8 **DY:** -when did that get there and why isn't it initialed?

9 **SC:** But Kathy didn't photograph after she packaged hers, right?

10 **DY:** Correct.

11 **SC:** Did anybody-

12 **DY:** Correct.

13 **SC:** -ask Kathy?

14 **LB:** Or has anybody even clarified-

15 **DY:** I don't know if they-

16 **LB:** -where that tape came from?

17 **DY:** -I'm trying to remember, I don't think they asked her-

18 **SC:** 'Cause where would her tape-

19 **DY:** -in the trial.

20 **SC:** -be on there?

21 **DY:** Oh it'll, you'll see it right there.

22 **SC:** Oh never mind then.

1 **DY:** Oop, god I keep touching it.

2 **SC:** And it's initialed.

3 **DY:** And it's initialed, okay? Um-

4 **SC:** Okay.

5 **DY:** -let me go back to hers. Oops.

6 **SC:** Why, she, that wouldn't, yeah.

7 **DY:** So there's hers.

8 **SC:** Mm hmm.

9 **DY:** There's mine, original. There's John's, okay? And-

10 **LB:** Does everybody open it from a different spot?

11 **DY:** Typically, but you know-

12 **LB:** Like you kind of slit the envelope so you can put a fresh closure?

13 **DY:** Correct. And so that's, it's typical because that way you don't run into this kind of

14 confusion.

15 **SC:** Mm hmm.

16 **DY:** Right?

17 **SC:** Yeah.

18 **LB:** Everybody's got their own separate-

19 **DY:** Yes.

20 **LB:** -portion.

21 **DY:** Yes. But is that like specifically taught by anyone in our agency? I don't think so.

22 **SC:** Huh uh.

1 **DY:** And I don't think it ever has been.

2 **SC:** Huh uh.

3 **DY:** Which is something that we should probably train now or it be brought up.

4 **SC:** Absolutely.

5 **LB:** But like John McCure knows to o-, he opens in a different-

6 **DY:** He does.

7 **LB:** -spot than you.

8 **DY:** 'Cause John, John's a smart guy.

9 **LB:** So he's been, he is, he has, I mean maybe he's been trained like when he's-

10 **DY:** Right.

11 **LB:** -gonna do these to open in a separate spot and then the other lady uh Kathy or

12 Katie or-

13 **SC:** Kathy.

14 **DY:** Kathy.

15 **LB:** -Kathy-

16 **DY:** Mm hmm.

17 **LB:** -she's opened it, it looks like in a different spot. Although the way her tape is, I

18 can't tell where she, did she slit the-

19 **DY:** You can see it.

20 **LB:** -envelope-

21 **DY:** Yeah.

22 **LB:** -like right in the-

1 **DY:** Yeah, right there.

2 **LB:** Okay, so she made a slit across-

3 **SC:** Oh, so there would be-

4 **LB:** -of the-

5 **SC:** -no reason for her to tape that candy cane tape on top.

6 **DY:** No, no.

7 **SC:** So-

8 **LB:** Was that, was that side of the thing coming loose potentially?

9 **DY:** Well, and that's, you're reading my mind, okay?

10 **LB:** Okay.

11 **SC:** Mm hmm.

12 **DY:** And that's where this for me is-

13 **LB:** 'Cause this thing has been passed around-

14 **DY:** -this for me-

15 **LB:** -how many times now?

16 **DY:** -this for me is more of a preemptive strike on what's coming I think.

17 **SC:** Yeah.

18 **LB:** Okay.

19 **DY:** The defense, they, I think they know damn well that this is here and they're

20 waiting for me to get on the stand and talk about this.

21 **SC:** Is this the cell phone that's damning-

22 **DY:** Yes.

1 **SC:** -or the Blackberry? It happens to be-

2 **DY:** It's that one.

3 **SC:** -the cell phone.

4 **DY:** Well they're both very damning, okay?

5 **SC:** Yeah, okay.

6 **LB:** But there's, it's very obvious that this one is-

7 **DY:** It's, this one is the primary-

8 **LB:** -there's something not-

9 **SC:** Her-

10 **LB:** -accounted for with that tape on it.

11 **SC:** -her phone?

12 **DY:** Right. Yes, in the evide-, evidence wise yes, this is more heavy-

13 **SC:** Her phone.

14 **DY:** -on evidence, her phone. Because Germaine deleted a bunch of his messages and

15 we weren't able to recover them all.

16 **SC:** Mm, okay.

17 **DY:** Um okay, so I'm sitting here right, and I'm going okay-

18 **SC:** Where the hell did that come from?

19 **DY:** -what the heck?

20 **SC:** Yeah.

21 **DY:** So, that's where this comes about. Um-

22 **LB:** Your supplement.

1 **SC:** Okay.

2 **DY:** -so it would have been on-

3 **LB:** Did the prosecutors, did the prosecutors even notice this? Or is this sole-, did you

4 bring this solely to-

5 **DY:** They did 'cause I, I want to say, well let, let me-

6 **LB:** Okay, yep.

7 **DY:** -let me, so January 13th um is when I, after trial, I went back and I started going

8 through all this evidence.

9 **SC:** Mm hmm.

10 **DY:** And I'm like what the heck, and I'm going through our system, I'm looking at

11 chain of custody logs. Um this item, 104 and 103, everything is logged for the

12 times that we sent these out to be uh forensically examined, okay? There's a chain

13 of custody-

14 **SC:** Yeah.

15 **DY:** -for that.

16 **SC:** Right.

17 **DY:** Um there is no chain of custody on when it may have been signed out or

18 somebody put this on here. Do you get what I'm saying?

19 **SC:** Yeah, yeah.

20 **LB:** Do you have the date range for when you-

21 **DY:** I do.

1 **LB:** -like a tight enough date range where you can say this tape had to have been
2 applied within this window?
3 **DY:** Yes. So-
4 **SC:** Between Scott and Kathy.
5 **DY:** Correct. It would have been-
6 **SC:** Between that timeframe.
7 **DY:** -April 20-, let me look at this, April 26th, 'cause that's when I entered them into,
8 back into evidence.
9 **SC:** 2025.
10 **DY:** Of um, no 27-
11 **SC:** I'm sorry-
12 **DY:** -2017.
13 **SC:** -2018?
14 **DY:** 2017.
15 **SC:** 'Cause Scott's was 2018.
16 **LB:** Yeah, so between-
17 **SC:** Okay.
18 **LB:** -April 26th of 2017?
19 **DY:** Yes.
20 **SC:** And October of-
21 **DY:** And October-
22 **SC:** -2018.

1 **DY:** -of 2018.

2 **SC:** Okay.

3 **LB:** Do you know October what of 2018?

4 **DY:** Uh yeah, it would have been, let's see, he would have it in here. Let's see here. Oh

5 actually I could look at the uh, the log.

6 **SC:** Interesting. This clarifies a lot more.

7 **LB:** Mm hmm.

8 **DY:** And this, okay here we go. That way you guys can kind of see what I'm talking

9 about here.

10 **SC:** Okay.

11 **DY:** So this is our you know, RMS.

12 **SC:** Mm hmm.

13 **DY:** This is our evidence. I'm under item, which one am I under? Okay, let's say, okay

14 here's the-

15 **LB:** 103.

16 **DY:** -Blackberry.

17 **LB:** The Blackberry.

18 **SC:** Mm hmm.

19 **DY:** Okay.

20 **LB:** Is this the phone that's got the extra tape?

21 **DY:** No.

22 **SC:** Huh uh.

1 **LB:** No, 'cause that's Germaine's.

2 **SC:** Uh huh.

3 **DY:** And I can show you that one too. This one is Germaine's that we're looking at
4 now. So as I'm going through this stuff I see there's a property room history here,
5 okay?

6 **SC:** Okay.

7 **DY:** And mind you, I don't know what the hell this is-

8 **SC:** Right.

9 **LB:** How to read all the-

10 **SC:** And the system is new to all of us too.

11 **DY:** Correct. So I'm looking at this, right and look at this. I'm seeing 0543 on 0124 in
12 the morning, checked out-

13 **SC:** Hmm.

14 **DY:** -um 0420 and I'm, 0339 okay? And I'm going what are these crazy morning
15 hours?

16 **SC:** Mm hmm.

17 **DY:** And um there's even some that are all zero, or at least some of the evidence is all
18 zeros.

19 **SC:** Hmm.

20 **DY:** So okay, so I scroll down further and I'm like okay chain of custody, boom. This is
21 what I really want, right?

22 **SC:** Right.

1 **DY:** So I'm looking through the chain of custody and I see okay, 4/21, signed out to
2 me-

3 **SC:** Mm hmm.

4 **DY:** -that was sent to Kathy.

5 **SC:** Okay.

6 **DY:** Okay? 4/27 it's returned by the detective, which this is the other thing we've got to
7 improve on somehow. I dropped these phones off on 4/26 but again, it was in the
8 afternoon-

9 **SC:** And it doesn't get logged.

10 **DY:** -per my chain of custody.

11 **SC:** Yes.

12 **DY:** So that's why it shows-

13 **LB:** Do you en-

14 **DY:** -4/27.

15 **LB:** -do, do you enter it in though? 'Cause like when you return it, is there a thing for
16 the person returning it to enter I, like I put it, secured it in locker-

17 **DY:** That's what we need to change.

18 **LB:** -locker 105-

19 **SC:** It used to be. The old system did.

20 **DY:** We need to change that or something because what you do is you lit-, you, you
21 grab your item and your chain of custody and you turn it into locker, boonk, walk
22 away.

1 **LB:** Just lock it. But you don't enter that hey, I put it back in at this time.

2 **SC:** Oh.

3 **DY:** Correct.

4 **LB:** That's a major-

5 **SC:** That's a problem.

6 **DY:** It's a major problem because-

7 **LB:** -because now it's-

8 **DY:** -defense is gonna say-

9 **SC:** We don't know where this phone was.

10 **LB:** Where was it-

11 **DY:** Yes.

12 **SC:** Mm hmm.

13 **LB:** And you can say it was in a locker 'cause that, but-

14 **DY:** But they have to believe me.

15 **LB:** Yes.

16 **SC:** Right, which they're-

17 **DY:** Right.

18 **SC:** -yeah.

19 **LB:** 'Cause you, what if a guy leaves it in his trunk of his car-

20 **DY:** 100 percent.

21 **SC:** Yeah.

1 **LB:** -and then just turns it in during normal business hours but it's been in his
2 possession-

3 **DY:** Correct.

4 **LB:** -or-

5 **SC:** He filled out the paperwork-

6 **DY:** Correct.

7 **LB:** -in his car or wherever-

8 **SC:** -yeah, whatever.

9 **DY:** So that's-

10 **LB:** So the minute you put it in, when you put it in-

11 **DY:** Mm hmm.

12 **LB:** -the locker it should be entered.

13 **DY:** And guess what it does? Nine years later it confuses me when I'm having to
14 articulate why things are what they are.

15 **SC:** Yeah.

16 **DY:** This took hours of like wrapping my mind around and looking at and everything
17 else and going back in the case and looking at my supplement to see that I didn't
18 do it on 4/27. No, I dropped it off on 4/26 in, at 14-, 1406 hours and P and E just
19 didn't get around to it 'til the following day.

20 **SC:** Yeah.

21 **LB:** Well, right and even think, what if they've already done their pick up for the day?

22 **SC:** Yeah.

1 **LB:** Even if it's during business hours-

2 **DY:** Exactly what it is.

3 **LB:** -and now it sits all night or hits a weekend so it's-

4 **DY:** Right.

5 **LB:** Now do the tech-, since I haven't signed much out of P and E-

6 **DY:** Mm hmm.

7 **LB:** -I don't think in my career-

8 **SC:** Mm.

9 **LB:** -as detectives, when you turn stuff back in, so you're returning these phones-

10 **DY:** Mm hmm.

11 **LB:** -do you cut a supp? On this date, I picked up the phone from Kathy Enriquez.

12 **DY:** Mm hmm.

13 **LB:** I went to Goodyear Opps and resecured the item in locker this at this time?

14 **DY:** You should.

15 **SC:** Yeah.

16 **LB:** Do, do-

17 **DY:** That way, that way you avoid-

18 **LB:** There's a-

19 **DY:** -these issues-

20 **LB:** Well-

21 **DY:** -and I did do this and, and that in this case.

22 **LB:** Okay. So you-

1 **DY:** Um-

2 **LB:** -you have a document of when you dropped off?

3 **DY:** Yes.

4 **LB:** So then it's within the timeframe.

5 **DY:** It is.

6 **LB:** Okay.

7 **DY:** It is. And I think that's, I think that's explainable.

8 **SC:** Yeah.

9 **LB:** Right.

10 **DY:** Um what's not explainable are these erroneous early morning hours-

11 **SC:** Yeah.

12 **DY:** -um and then movement of evidence.

13 **SC:** Mm.

14 **DY:** It should be signed, it, okay let me, let me finish this first.

15 **LB:** Okay, yeah keep going on this, yeah.

16 **DY:** Okay, so if you look at all these chain of custody dates and times, they are

17 consistent with every time. So here you go, here's March, which was the

18 timeframe where John had the extraction and it was turned back in. Here's the 13th,

19 okay?

20 **LB:** Mm hmm.

21 **DY:** You have April, which was consistent with Kathy. You have the 10th, which would

22 have been consistent uh, well hang on. Yeah, here it is. 10/17/2018 with Scott,

1 okay? Um these other times, the 10/19 of 2020 and the 12/20 of 2018, this is when
2 the defense signed them out to do their extractions on the cell phones.

3 **SC:** Okay.

4 **LB:** Okay.

5 **DY:** Okay?

6 **LB:** And those were released by a Bruce Gillum it appears?

7 **DY:** Yep, and here's-

8 **LB:** Well, it says released but it says to and it has your name. Does that mean they gave
9 them to you?

10 **DY:** It was, it was released to me-

11 **LB:** And then you give them-

12 **DY:** -and I, I didn't leave the room while they did the extractions on these phones,
13 okay?

14 **LB:** Okay.

15 **DY:** Um-

16 **LB:** Do you have supplements in on that?

17 **DY:** I don't think I do.

18 **LB:** Okay.

19 **DY:** But that, they're not even arguing that.

20 **LB:** Okay.

21 **SC:** Yeah.

22 **DY:** Because they did it, the defense did it. Like-

1 **SC:** Right.

2 **LB:** Okay.

3 **DY:** -they, they know they did that.

4 **LB:** Okay.

5 **DY:** But I, what I will tell you is I didn't notice that tape, um and that could have been
6 just 'cause I wasn't-

7 **LB:** Are there pictures-

8 **DY:** -paying attention.

9 **LB:** -are there pictures when the defense opened them up?

10 **DY:** I'm sure there are. I'm sure there are. But, but it doesn't matter. It doesn't matter
11 because the defense did this after the tape was already there.

12 **LB:** Okay.

13 **DY:** Yeah, you get-

14 **LB:** Okay.

15 **DY:** -what I'm saying?

16 **LB:** Our, our, our window, yeah.

17 **DY:** Yeah.

18 **LB:** So October something.

19 **DY:** Right. So that, yeah. Um so anyway, to me, I can see that the chain of custody is
20 sound as far as uh when this item was signed out and signed back in, except for, I
21 say that, except for we had a evidence viewing on May, when was it, May 29th-

22 **SC:** 20-

1 **DY:** -of 2025 where Andrea signed out a, just a bulk amount of items to me. Everyone
2 was there, all the prosecutors, all the defense attorneys to review the evidence,
3 okay? That's in the chain of custody.

4 **LB:** May 29th you said, of '25?

5 **DY:** Yep. Which is right-

6 **LB:** A bulk sign out?

7 **DY:** Yep, which is right here. And all that was was for the defense to photograph the
8 evidence, to open some of the evidence, to view um for preparation of the trial,
9 okay?

10 **LB:** Okay.

11 **SC:** So it was the 20-, and that, is that your report from the 29th? 'Cause I have the 25th
12 on-

13 **DY:** Yes, I did a correction.

14 **SC:** You did?

15 **DY:** That, yeah that was-

16 **SC:** Okay.

17 **DY:** -my fault.

18 **SC:** Okay.

19 **DY:** Um yeah, do you not have that?

20 **SC:** No.

21 **DY:** Here.

22 **SC:** Oh this is the corrected one?

1 **DY:** So, yeah that's the correct-

2 **SC:** Oh okay.

3 **DY:** -and that was done like an hour after this one by the way.

4 **SC:** Okay.

5 **DY:** Yeah, 'cause I, I caught it. I was like oh shit.

6 **SC:** Cool.

7 **DY:** That's the wrong date.

8 **SC:** Awesome.

9 **DY:** Anyway-

10 **LB:** Okay, so May 29th, bulk evidence viewing-

11 **DY:** Yes.

12 **LB:** -everything is out. Is there, is that clear on there?

13 **DY:** It's not because Andrea does the bulk sign out May 29th at 0300, okay?

14 **LB:** What time does it say on here?

15 **DY:** So-

16 **LB:** What time did you guys actually do it? Was it May, so 0300, was it-

17 **DY:** So it was-

18 **LB:** -actually like-

19 **DY:** -it was actually 0935. So, and it, here we go.

20 **SC:** Mm.

21 **DY:** This is, this is, when I saw this I'm going oh no, right because you have all these

22 crazy times up here-

1 **SC:** Mm hmm.

2 **DY:** -then on the chain of custody, she essentially is showing two sign out times in one
3 day to me.

4 **LB:** Yeah.

5 **DY:** One-

6 **LB:** 935-

7 **DY:** -one at 0300-

8 **SC:** At three o'clock-

9 **LB:** Three in the morning.

10 **DY:** -and one at 0935.

11 **LB:** On, both on 5/29?

12 **DY:** Both on 5/29.

13 **LB:** Okay.

14 **DY:** So now I see this-

15 **SC:** Hmm.

16 **DY:** -and I start tapping through different evidence, okay? And I go to item 103A which
17 is a thumb drive for, it, 103A and 104A, which are thumb drives from John's
18 original extraction and I'm like you know, let me just look at this chain of custody.
19 And I see, again, all these crazy times from, in the property room backside. Then
20 as I scroll down at the chain of custody um I see uh that same bulk time
21 discrepancy. I go further down and at the very bottom of this, oh here's a whole
22 nother thing that I asked Andrea about. There's a whole different status tab that she

1 really had no clue what, what this was. Um and so, down here in a tab below here
2 it said that those thumb drives, item 103A and 104A, were destructed and
3 destroyed and are no longer in evidence.

4 **SC:** Oh okay-

5 **DY:** And I said-

6 **SC:** -that's what it was.

7 **DY:** -oh my god.

8 **LB:** Do you know what date it said those were destroyed?

9 **DY:** It was like 2020 I want to say or something like that. I could be wrong. Don't
10 quote me on it. It was something like, or no, it might, might have been 2025, last
11 year.

12 **SC:** It said they had been destructed.

13 **DY:** Correct.

14 **SC:** Okay.

15 **DY:** So now I'm going in like complete panic mode, okay?

16 **SC:** Yeah.

17 **DY:** I'm going oh my gosh. So I, the next morning I went straight to Andrea-

18 **SC:** Mm hmm.

19 **DY:** -with this laptop, okay? And I said Andrea we have a serious problem and she's
20 like okay, you know, what, what's going on Noah and I'm like I've got to sit down
21 and show you all this 'cause it's hard-

22 **SC:** Mm hmm.

1 **DY:** -to explain and I've got to show this to you. And I, I'm doing what we're doing
2 right now-

3 **LB:** Going through each of these-

4 **DY:** Yep, and I, and I started from the top. Okay, um well actually I started off with
5 first off, um this is what we got and I told her about it.

6 **LB:** And she's the supervisor. This is recently that you went-

7 **DY:** Yes.

8 **LB:** -or in, in May.

9 **DY:** This would have been January 14th-

10 **LB:** Oh okay. January-

11 **SC:** This year.

12 **LB:** You're brining all these things to-

13 **SC:** Yeah.

14 **LB:** -her.

15 **DY:** Yeah, January 14th at 0800 in the morning is when I talked to Andrea.

16 **LB:** Okay.

17 **DY:** 'Cause-

18 **SC:** So when you wrote your supp.

19 **DY:** -I literally sent her an email, can I come over and see you?

20 **SC:** Yeah.

21 **DY:** And um she's like absolutely. So I sit down with her and I'm like Andrea we've
22 got a serious problem. This, this is what's going on. I said clearly the, the defense

1 is trying to say that from, from the beginning that we've been altering evidence in
2 this case.

3 **SC:** Oh gosh.

4 **DY:** Yeah, and I said and now I'm really concerned. And um so I, I show her the
5 property room history tab and I'm showing her these times, right? And she's like
6 oh yeah, what? Yeah, I, we're not there in the morning at that time. I said okay,
7 then why are they there?

8 **SC:** Mm hmm.

9 **DY:** And she goes oh man, we've had this problem for years Noah. She's like these
10 times have been in the system, these wacky times, um have been in the system for
11 years. We've been trying to figure this out. Um I believe it was from uh it's a
12 software issue. I believe that I-, IT has been involved a couple of times she told me
13 um trying to uh duplicate the problem and they can't duplicate it. She said that
14 Mark knew about it. Um and she's like I've brought this up. She said that Greg has
15 known about it, Garner.

16 **SC:** Uh huh.

17 **DY:** Um and I said okay, okay you know, and she's like I don't know why these times
18 are there. They're not, they're inaccurate. Those are not correct. We've been
19 having this problem and it was, she said it was fixed when we went from New
20 World Systems to RMS, okay? And I said-

21 **LB:** She said it was fixed?

22 **DY:** She said it was fixed. Well, what she believed as being fixed-

1 **LB:** Okay.

2 **DY:** -okay?

3 **SC:** Mm.

4 **DY:** And I said well hang on Andrea, I've got a problem and she's like what do you
5 mean and I scrolled down to the chain of custody and I showed her the 2025 date
6 and I said look-

7 **SC:** Yeah.

8 **DY:** -and she goes oh, she's like yeah, I, I don't know why it shows 0300 and then she
9 says I, I want, I want to say that she may have said that she fat fingered it or
10 something like that. Again, the fat finger thing.

11 **SC:** Mm hmm.

12 **DY:** And but then she said it could be that we're having those issues still. And I said
13 okay yeah, 'cause that's what I'm noticing is like there's two sign outs.

14 **LB:** Yeah.

15 **DY:** And so she's like yeah, it must still be having the problem then and you know,
16 she's, I could tell she's clearly like upset you know, like I don't know why this is
17 going on.

18 **SC:** Mm hmm.

19 **DY:** And so um so then I said you fat fingered it. I said are you guys able to cha-,
20 change the times on the chain of custody and she says yeah, we can, it, we have
21 administrative rights. We can and we have changed times on the chain of custody
22 in the system. And so now, my wheels are going like oh my god.

1 **SC:** Fuck.

2 **LB:** Yeah.

3 **DY:** Why are you guys changing times?

4 **LB:** Right.

5 **SC:** Oh gosh.

6 **DY:** And I think I did ask her that in a round about way. I don't remember exactly how
7 I posed the question. And she says well there's been times that we, we have
8 changed times to match the officer's report, so what the officer has put in their
9 report. And so I'm going that's a problem.

10 **SC:** Yeah, and how long-

11 **DY:** Because-

12 **SC:** -has this been going on?

13 **DY:** -because we should be, we should be documenting-

14 **SC:** Every time.

15 **DY:** -exact, okay?

16 **LB:** When I-

17 **SC:** Yes.

18 **LB:** -yeah, as the officer, when they put it in the locker hopefully there's a supp or if
19 we had a system-

20 **DY:** Mm hmm.

21 **LB:** -where you entered it in, but then when they actually receive it, it's that-

22 **SC:** That should be a different-

1 **LB:** -moment when they receive.

2 **DY:** Correct.

3 **SC:** Yeah.

4 **DY:** And the officer-

5 **LB:** Even if it is over the weekend.

6 **DY:** Correct.

7 **SC:** Yeah.

8 **LB:** We're not saying oh he returned it on a Friday-

9 **DY:** Yeah.

10 **LB:** -but we're putting in Monday morning. That's explain-, that's-

11 **DY:** Exactly.

12 **SC:** And how long have they been-

13 **DY:** A officer-

14 **SC:** -doing this?

15 **LB:** I removed it from the locker-

16 **DY:** I don't know. I didn't ask that question, how long it's been going on. But um, but

17 yeah so and my, and my thought process is no, these times should be concrete.

18 **SC:** Yes.

19 **DY:** The officer should document why his time is different. And I didn't tell her that,

20 but that's what I'm thinking in my head.

21 **SC:** Yeah.

22 **DY:** I, my mind is now going crazy-

1 **SC:** Gosh, yeah.

2 **DY:** -at this point. I'm going oh my god.

3 **SC:** Fuck.

4 **DY:** So I told Andrea pause our conversation right now. I literally have to get going to
5 court. Can you please rush back there and see if items 103A, and I said Andrea and
6 I haven't gone through all the evidence, 103A, 104A are back there 'cause it's
7 saying it's destroyed. Oh I showed her that-

8 **SC:** Yeah.

9 **DY:** -and she goes I don't, I didn't put that in there. I said-

10 **SC:** Is there a, does it say who put that in there, the destruction?

11 **DY:** Let me see if I can show it again. Um-

12 **SC:** It should have a, a-

13 **LB:** Well now it should be a history showing-

14 **SC:** -who destroyed it.

15 **LB:** -it was entered as des-, yeah.

16 **SC:** Yeah.

17 **DY:** So it was-

18 **LB:** Or who made that entry.

19 **DY:** -so just FYI, none of the evidence was destroyed.

20 **LB:** Yeah.

21 **SC:** Right.

22 **DY:** There's been an audit. It's all, you guys probably know.

1 **SC:** Yeah, yeah.

2 **DY:** It's, it's all accounted-

3 **LB:** We, we heard that it's all there.

4 **DY:** -it's all accounted for.

5 **LB:** Yeah. But who-

6 **SC:** Who entered that?

7 **LB:** -entered it as destroyed?

8 **DY:** It doesn't sound like, well I, I don't want to speculate. I don't know. That's

9 something that someone's going to have to figure out. It-

10 **SC:** How can the system just pick it as destroyed?

11 **DY:** So she goes back, tells me it's all there. I said okay, perfect. I gotta run.

12 **SC:** Yeah.

13 **DY:** I leave property and evidence. Oh, and before I left property and evidence I said

14 Andrea, I'm gonna tell them, I have to tell my supervisor about this and I said this

15 may be a massive  storm-

16 **SC:** Mm hmm.

17 **DY:** -just FYI. And um she's like okay, yeah I understand. And so I left and uh I'm

18 driving to court and I, and I thought about the tape, okay?

19 **SC:** Yeah.

20 **DY:** And so I call her back and I said Andrea um, we played some phone tag, okay?

21 **LB:** Yeah.

1 **DY:** I get ahold of her, I said hey a question for you and she's like what and I go I
2 vaguely remember this with maybe some other cases and stuff but anytime, or
3 maybe from your hearing from Lori or you or somebody, if evidence items are
4 falling apart like the envelopes are damaged or-

5 **LB:** Yeah, and all the times they're shuffled back and forth and-

6 **DY:** -shuffled about-

7 **LB:** -it starts to break it down.

8 **DY:** -um the bag is ruffled, you guys will add additional tape to it to secure the item.
9 And she's like yeah, that's, that's common and I said okay, so do you guys, do you
10 guys initial or document that and she says no. So I said okay, all right. So um I
11 think that was it, pretty much it with, with the conversation.

12 **LB:** That they, that they do that.

13 **DY:** That they do that.

14 **LB:** What, that they don't-

15 **SC:** They don't document.

16 **LB:** -doc-

17 **DY:** Oh yes-

18 **SC:** They don't-

19 **DY:** -that they don't document it.

20 **SC:** And don't initial.

21 **LB:** That they-

22 **DY:** Um-

1 **LB:** -we received this back from the officer and his return packaging was found to be
2 in you know, poor condition-

3 **SC:** Nothing.

4 **LB:** -not opened but-

5 **DY:** Correct.

6 **LB:** -like whatever they need to document.

7 **DY:** Correct.

8 **LB:** Box is crumbled in, we're gonna-

9 **DY:** Right.

10 **LB:** -remove and repackage-

11 **DY:** Right.

12 **LB:** -with photos.

13 **DY:** She, yeah, she, she told me that they will sometimes tape or apply another package
14 over it and seal it um and that was pretty much uh the, the end of it, okay? So I go
15 to court and I'm, I'm trying to get ahold of my prosecutors that morning but it was
16 so busy and again, I told you, they don't really-

17 **LB:** They don't talk, yeah.

18 **DY:** -communicate much with me. It just so happens I'm in the elevator with them to
19 go downstairs for lunch-

20 **SC:** Mm hmm.

1 **DY:** -and I whispered in the Prosecutor, Joshua Clark's ear, we have a se-, I think we
2 might have a serious problem with our chain of custody on this case with some of
3 the items.

4 **LB:** Yeah.

5 **DY:** And he says Noah, let's talk about it after trial. Okay, so that day, which is in the
6 supp, about 4:45 um they, we all walked over to the prosecutor's section of um the
7 building and they brought me in a conference room and this, and I didn't catch his
8 last name, he was a lieutenant from MCAO. He's sworn. Um his name is Ken. Um
9 and he was in the room, introduced himself to me, and we all sat down like we are
10 now in the conference room and uh Prosecutor Clark goes hey Noah, I'm not sure
11 what you're about to tell us so obviously I'm concerned um and I want a witness
12 here. And I said fair and nothing wrong with that, I'm okay with that you know?
13 No, no issues.

14 **LB:** Yeah, nothing to hide. Yeah.

15 **DY:** Yeah.

16 **SC:** Yeah.

17 **DY:** And so I told them, not in probably this detail, but I told them a, a high level
18 summary of what I found.

19 **LB:** Here's the things I've discovered during my prep.

20 **DY:** Right. And so, as that's happening um Wade, Prosecutor Wade, is like typing
21 certain notes and she says all right, Noah, when it was done, let me be clear. I have
22 some bullet points here, bing, bang, boom. I said yes and she says you're going to

1 need to let your supervisors know about this if you haven't already. Have you?
2 And I said yeah, I let Sergeant Duque know um and uh and she's like okay
3 because we have to forward this up our chain of command like asap.
4 **LB:** Yeah.
5 **DY:** And I said yep, understand.
6 **SC:** Mm hmm.
7 **LB:** Yeah.
8 **DY:** So obviously it sounds like the prosecution side got to chief before we were able
9 to.
10 **SC:** Yeah.
11 **DY:** That's how quickly that escalated. Um and uh they told me, the prosecutors told
12 me, this needs to be documented in a supplement and we need it tonight. That's
13 why this was done.
14 **SC:** Okay.
15 **LB:** Right. Okay.
16 **DY:** Um-
17 **LB:** Well yeah, to memorialize the information, not lose track of where we're at.
18 **SC:** Yeah.
19 **DY:** Right.
20 **LB:** Okay.
21 **DY:** And that was disclosed that night to defense.
22 **SC:** Right.

1 **LB:** Okay.

2 **SC:** Okay.

3 **DY:** So-

4 **LB:** Does-

5 **SC:** Um-

6 **DY:** -this, this, these supps were disclosed that night.

7 **LB:** -does your supp talk about the tape?

8 **DY:** Mm, I did talk about the repackaging. I didn't-

9 **SC:** It's not detailed though.

10 **DY:** -I, yeah, I, I didn't specifically talk about it-

11 **SC:** Yeah.

12 **DY:** -because this-

13 **LB:** Because you don't know-

14 **DY:** -hasn't got-

15 **LB:** -all the-

16 **DY:** Correct.

17 **LB:** -yeah, and you also don't know all the details yet-

18 **DY:** Correct.

19 **LB:** -of how that occurred and-

20 **DY:** Exactly.

21 **LB:** Okay.

22 **SC:** So with the tape, that being said, the candy cane-

1 **DY:** Mm hmm.

2 **SC:** -was it the last strip of tape over that? Was it like the freshest piece or was there
3 another clear tape over it, do you know?

4 **DY:** Without actually looking at the item-

5 **SC:** It's just the, okay.

6 **DY:** -it appears in the picture that that is the last thing over my tape-

7 **SC:** Yeah.

8 **DY:** -of my clear tape.

9 **SC:** Right, right.

10 **DY:** Yeah. Um so and, and this is the other, this is the other strange part of this whole
11 thing, okay? Um during the trial Ms. Hamilton mentions, I'm trying to remember
12 which witness it was, I want to say it was, it might have been Scott, something
13 about Lisa's phone being accessed in June.

14 **SC:** Of-

15 **DY:** Of 27-

16 **SC:** -2017?

17 **DY:** Well actually I don't know if she gave a date.

18 **SC:** Oh okay.

19 **DY:** A, a year.

20 **SC:** Oh okay.

21 **DY:** I don't, I, I'm not sure if she did.

22 **LB:** Is this where it was tethered? 'Cause we've heard that term-

1 **DY:** Correct.

2 **LB:** -tethered.

3 **DY:** Tethered and um she mentioned something about a deleted app but didn't go into
4 any sort of detail. It was kind of one of those sneaky little questions that she threw
5 in to one of the witnesses. And that, between all that, that's what got my brain
6 going. Oh my god-

7 **LB:** Well yeah, if, if the-

8 **DY:** -what's going on?

9 **LB:** -if the phone has been, if she's making a comment about a phone having been
10 accessed and that's-

11 **SC:** And now-

12 **LB:** -while it's in our custody?

13 **SC:** -and now you have-

14 **DY:** Correct.

15 **SC:** -between April-

16 **DY:** Correct.

17 **SC:** -of '17 to October of 2018-

18 **LB:** You don't remember-

19 **SC:** -that tape being applied.

20 **LB:** -you don't remember what June though she said? Was it June of '17?

21 **DY:** June of '17 I believe. I believe.

22 **SC:** Which the, the-

1 **DY:** I believe.

2 **SC:** -questionable timeframe of the tape is between-

3 **DY:** Correct.

4 **SC:** -April and October-

5 **DY:** Correct.

6 **SC:** -that's a massive-

7 **DY:** Right.

8 **SC:** -fucking problem.

9 **DY:** It's a massive problem.

10 **SC:** Yeah.

11 **DY:** Right.

12 **LB:** Now uh-

13 **DY:** And so-

14 **LB:** -hold on-

15 **DY:** Yeah.

16 **LB:** -and these additional extractions-

17 **DY:** Mm hmm.

18 **LB:** -'cause there was an extraction by Scott Keely-

19 **DY:** Mm hmm.

20 **LB:** -in October of '18 which would be post-tape.

21 **SC:** Yes.

22 **DY:** Right.

1 **LB:** Post-tethering-

2 **DY:** Right.

3 **LB:** -of phone.

4 **SC:** Yep.

5 **LB:** Did his extraction identify a deleted app or a, a tethering, meaning I'm assuming

6 that's a powering up of the phone where it's connecting?

7 **DY:** So, so you, you're, you're reading my mind the way I was doing it too and I was

8 looking, I've looked, I have looked into this.

9 **SC:** Mm hmm.

10 **DY:** Um his tethering shows January of 2017.

11 **SC:** What?

12 **DY:** Yeah.

13 **LB:** Which would be-

14 **SC:** But this is where it sh-

15 **LB:** -pre-

16 **DY:** Which would be pre-Kathy's and pre-John's. And I tell you all this because the

17 defense could be full of it-

18 **SC:** Yeah.

19 **DY:** -at this point.

20 **SC:** Yeah.

21 **DY:** I know I'm not-

22 **LB:** I was going to say, do we actually, he, his shows a tethering? Hi-, he, his-

1 **DY:** I believe his shows a tether-

2 **LB:** -his extraction shows it was tethered? So I guess my question though is then how,
3 how would that, is there an explanation for how that phone, and is it factual that it
4 did, 'cause is it just the defense saying the phone tethered and deleted an app?

5 **DY:** There's no facts that the defense has produced at this point.

6 **SC:** Okay.

7 **DY:** Zero.

8 **LB:** That it was actually tethered-

9 **DY:** Correct.

10 **LB:** -and had an app deleted.

11 **DY:** Correct.

12 **SC:** Okay.

13 **DY:** But if they're saying this-

14 **SC:** Mm hmm.

15 **DY:** -of course it makes my brain go, do they know something I don't?

16 **SC:** Mm hmm.

17 **LB:** This was in her phone or his phone?

18 **DY:** Her phone.

19 **SC:** Hers.

20 **LB:** And hers is an iPhone.

21 **SC:** Mm hmm.

22 **DY:** And hers is the one with the mysterious tape on it.

1 **SC:** Mm hmm.

2 **DY:** Okay?

3 **LB:** Okay. It, and, and her phone-

4 **DY:** And if you look at-

5 **LB:** -was wrapped in foil the whole time?

6 **DY:** It was.

7 **LB:** I'm, I'm just trying to go through my-

8 **DY:** Yeah.

9 **LB:** -basic knowledge of-

10 **DY:** Yeah.

11 **LB:** -I'm like well how could the phone possibly tether.

12 **DY:** Correct.

13 **LB:** It, uh the only way would it would have-

14 **DY:** Yeah.

15 **LB:** -to be unpackaged.

16 **DY:** Right. There's, there's also um-

17 **LB:** And there's no log showing it came, I guess I, I, I would want to lock in the tether-

18 **DY:** And, and this-

19 **LB:** -date that they're alleging-

20 **DY:** -this may, and I may be, I may be off on whether she's, they said tether or hot spot

21 or both. I don't even know.

22 **SC:** Okay.

1 **DY:** Do you know what I mean?

2 **SC:** Yeah.

3 **DY:** It, of course and I don't remember everything that they said. Um-

4 **LB:** But this phone wasn't stored in a, in a, like in the like how we can store phones

5 now-

6 **DY:** Like a Faraday box?

7 **LB:** Yeah, like where it's-

8 **DY:** No.

9 **LB:** -powered up so it doesn't-

10 **SC:** Not back then.

11 **LB:** -lose the battery? So that phone would have been dead, dead after-

12 **DY:** If it was left on, right.

13 **LB:** Yeah.

14 **DY:** What you're saying? But is it possible that Scott charged it-

15 **SC:** Mm hmm, while he was doing his-

16 **DY:** -while he was doing his thing and-

17 **SC:** Yeah.

18 **DY:** -didn't even realize it? I don't-

19 **LB:** And then when it finally powered back down-

20 **SC:** But he didn't get it 'til October, after the mysterious-

21 **DY:** Right.

22 **SC:** -tape appeared.

1 **DY:** Right. So, so what do I do, right?

2 **SC:** Mm hmm.

3 **DY:** I go through all my supps.

4 **SC:** Mm hmm.

5 **DY:** I go through all the activity notes. I go through um-

6 **LB:** Wait, hold up, hold, hold on a sec real quick-

7 **DY:** Yeah.

8 **LB:** -January of '17 is the alleged tether date?

9 **DY:** No.

10 **SC:** No.

11 **DY:** No, no, no, no. June-

12 **LB:** June?

13 **SC:** Mm hmm.

14 **DY:** -of 2017.

15 **LB:** June of 2017.

16 **DY:** But, but Scott's, so remember Scott did his after.

17 **SC:** He did his in October.

18 **LB:** Yeah.

19 **DY:** Correct. And his, let's see if the, is this his?

20 **LB:** So his extraction would show any activity on the phone.

21 **SC:** Mm hmm.

22 **DY:** Correct.

1 **LB:** Theoretically.

2 **SC:** Mm hmm.

3 **DY:** Yes.

4 **LB:** And it would definitely show a deletion of an app.

5 **DY:** And I'm telling you, I don't see it anywhere.

6 **LB:** Well was he inapt to just be asked?

7 **DY:** Uh he wasn't. Maybe they'll have to recall him or something.

8 **LB:** Well I was gonna say-

9 **DY:** I don't know.

10 **LB:** -you probably, that, from a standpoint of the case if they're, if they're alleging,
11 'cause that also helps, if the phone shows-

12 **DY:** Mm hmm.

13 **LB:** -so in that gap where that extra tape was added-

14 **DY:** Mm hmm.

15 **LB:** -but if his extraction can show nothing occurred, nothing was different on his,
16 between his and Kathy's, that at least says the phone was not, there was no
17 material change to the phone data.

18 **DY:** Right.

19 **LB:** Can, can that be solidified? I'm still not s-, uh the taping-

20 **DY:** Yeah.

21 **LB:** -of the packaging is still an issue.

22 **DY:** Well guess who's going to have to solidify that somehow?

1 **SC:** Yeah.

2 **DY:** This guy.

3 **SC:** Yeah. Exactly.

4 **LB:** Well that's what I'm wondering-

5 **DY:** And I'm not that computer savvy.

6 **SC:** Right.

7 **LB:** Well-

8 **DY:** Do you know what I mean?

9 **LB:** -do you have to have-

10 **SC:** Well that's a whole nother topic though.

11 **DY:** Yeah.

12 **SC:** Like we're focusing on the packaging and-

13 **LB:** Yeah and also how to handle your case-

14 **DY:** Exactly.

15 **LB:** -now, right?

16 **SC:** Yeah.

17 **DY:** Yeah you're, you're trying to-

18 **SC:** It's hard not to.

19 **DY:** -you're trying to save the case and I-

20 **SC:** Yeah.

21 **DY:** -and I, and I, and I get that. And that's what I'm trying to do too.

22 **SC:** Yeah.

1 **DY:** Um-

2 **LB:** I think if you just get up and-

3 **DY:** -here's, here's the good thing is-

4 **LB:** Kathy's gonna have to-

5 **DY:** -John's, John's and Kathy's are signed, sealed and delivered.

6 **SC:** Mm hmm.

7 **LB:** Yes, so anything-

8 **DY:** We're good there.

9 **LB:** -after that-

10 **DY:** So we have the evidence, in my opinion, we have the evidence if the prosecutors

11 want to fight this the way I hope they will-

12 **LB:** You just have to stick to the first two-

13 **SC:** Right, yeah.

14 **DY:** Yes.

15 **LB:** -extractions.

16 **DY:** Everything after that could be fruits of the poisonous tree, okay?

17 **LB:** Correct. It could be.

18 **DY:** Could be.

19 **LB:** You could make that-

20 **DY:** Could be.

21 **SC:** Yeah.

22 **LB:** -that argument, okay.

1 **DY:** So, that's my hope-

2 **SC:** Mm hmm.

3 **DY:** -in this whole thing why I'm telling you guys all this.

4 **SC:** Yeah.

5 **LB:** Yes.

6 **DY:** But obviously I'm pre-, I am preemptive striking this because obviously I don't

7 know why that tape is there, okay?

8 **SC:** Huh uh, no.

9 **DY:** And like I said, I went through and I have matched up data. There's no added text

10 messages. There's no deleted messages that are damning that-

11 **LB:** Show on one end or the other-

12 **DY:** -show that Goodyear did something-

13 **SC:** Right.

14 **LB:** Right.

15 **DY:** -okay?

16 **SC:** Yeah.

17 **DY:** Nothing obvious-

18 **SC:** Right.

19 **DY:** -okay? Um-

20 **SC:** Hmm.

21 **DY:** -so I go through all my supps. I go through all my um activity notes. Mind you, I

22 did search warrants for all of these phones.

1 **SC:** Mm hmm.

2 **LB:** Mm hmm.

3 **DY:** I knew how serious this case was.

4 **SC:** Yeah.

5 **LB:** Yep.

6 **DY:** There's no reason why I would go in P and E and sneak-

7 **SC:** Yeah.

8 **LB:** You already had rights-

9 **DY:** -'cause that's, sneak-

10 **LB:** -to go there. You had war-, search warrants.

11 **SC:** Yeah.

12 **DY:** -in the back of P and E-

13 **SC:** Which you can't even-

14 **DY:** -which I can't even get into-

15 **SC:** -can't even get to, yeah.

16 **DY:** Oh that's the other thing I want to show you guys is I asked Andrea about the

17 property history tab, right?

18 **LB:** Mm hmm.

19 **DY:** And I said isn't it true Andrea like I, I, I gotta know this and she's like what, and I

20 go, damnit. Sorry guys, let me find it again.

21 **SC:** No, you're good.

22 **DY:** Let me go to hers this time. I know, this is a lot, a lot of, a lot of-

1 **SC:** Well I mean just, just the confirmation alone of them being able to add stuff to
2 evidence without documentation.

3 **LB:** And inaccuracy with times throughout-

4 **DY:** It just looks terrible.

5 **LB:** Do you know, uh you may or may not know this Noah, did-

6 **DY:** Mm hmm.

7 **LB:** -you know if she reported this or did she tell you she was reporting this up her
8 chain due to the discrepancies?

9 **DY:** No. She-

10 **SC:** She just said Greg knew, IT knew-

11 **DY:** Mm hmm.

12 **SC:** -and Mark knew.

13 **DY:** Mm hmm. I-

14 **LB:** But she didn't-

15 **DY:** -I'm almost certain-

16 **LB:** -based on your discussion she didn't-

17 **DY:** -I'm almost certain-

18 **LB:** -say hey, I'm calling my boss 'cause we need to figure out why?

19 **DY:** Ha, I'm telling you guys right now, I am almost certain I said, well I do know I
20 asked her who is your boss and she told me Jennifer Calovini.

21 **SC:** Mm hmm.

22 **LB:** Mm hmm.

1 **DY:** I'm almost certain I told her you might want to let her know. I don't remember for
2 sure though.

3 **SC:** Yeah.

4 **DY:** I'm pretty sure I said it-

5 **SC:** Right.

6 **DY:** -but I don't want to-

7 **LB:** Would have, 'cause, 'cause you knew you were-

8 **DY:** -I don't want to-

9 **LB:** -going to be told, telling your side.

10 **DY:** Yeah.

11 **SC:** You knew-

12 **LB:** Okay.

13 **DY:** Yeah.

14 **SC:** -you knew it was gonna snowball.

15 **DY:** Right. I knew. I knew.

16 **LB:** But it would make sense based on the seriousness of what you were explaining.

17 **DY:** Yes.

18 **LB:** Okay.

19 **DY:** Um-

20 **SC:** Gosh dang.

21 **DY:** -okay. What am I going to show you? Oh yeah.

1 **LB:** Did they, did anybody add a supp? Did like Andrea add a supp or information
2 clarifying those items listed as destructed were located?

3 **DY:** Mm-

4 **LB:** And-

5 **DY:** -I'd have to look but I don't think so. And then are, do they even write supps?
6 That's my question to you guys.

7 **LB:** I think they-

8 **SC:** We-

9 **DY:** Do they?

10 **LB:** -I think they do. I think-

11 **DY:** I know Lori used to.

12 **LB:** -yeah, I think they-

13 **SC:** Lori, yeah.

14 **LB:** -can. I don't know, I don't know in practice if they do but if the items said they
15 were destroyed-

16 **DY:** Mm hmm.

17 **LB:** -it would makes sense to say this was an erroneous entry by this person on this
18 date.

19 **DY:** There it is. So now I'm in 103A.

20 **SC:** Okay.

21 **DY:** Do you see that? November 26th, 2025, item has been disposed of and should not
22 be in property room anymore.

1 **SC:** Where? Where? I can't see it.

2 **DY:** That's what I saw. This right down here, see?

3 **SC:** Oh down here, okay.

4 **DY:** Yeah.

5 **SC:** Thank you.

6 **LB:** Mm hmm. But on the s-

7 **SC:** Has been destroyed-

8 **LB:** -but then on the time right above it-

9 **SC:** -and disposed of-

10 **LB:** -so see the time though is-

11 **DY:** Mm hmm.

12 **LB:** -the ne-, like within-

13 **SC:** Who did it?

14 **LB:** -within eight minutes of it-

15 **DY:** Mm hmm.

16 **LB:** -item is misallocated, scanned and location different than the one it is assigned to.

17 **DY:** Mm hmm.

18 **SC:** What the hell?

19 **DY:** So I was like what the heck?

20 **LB:** What does that mean?

21 **DY:** Right.

22 **LB:** And then there's a-

1 **SC:** There's no, there's no identity of who entered that is there?

2 **DY:** No.

3 **LB:** Well they might be able to, on the back end, pull that.

4 **DY:** Yeah, I wonder if they can see it on the back end.

5 **SC:** What happens if you press the-

6 **DY:** Uh I don't know.

7 **SC:** -the three dots?

8 **LB:** It just looks like, I don't think yeah, we'll have to get an (INDISCERNIBLE)-

9 **DY:** Um-

10 **SC:** What if you click on it?

11 **DY:** This?

12 **SC:** Can you click on that and open, like double-

13 **LB:** No. I don't think they're hyperlinked.

14 **SC:** Oh my gosh.

15 **DY:** Huh uh.

16 **SC:** You know how it used to open up and it would show you like-

17 **LB:** Further like-

18 **SC:** -where it was entered, who it was entered by and all of that?

19 **LB:** Mm hmm.

20 **DY:** Yeah.

21 **SC:** Is that not a thing anymore?

22 **DY:** No, it's in there I think. Are you talking about this here? So if I go here?

1 **LB:** Can you find that same date on one of the other-

2 **SC:** Like-

3 **DY:** Uh it does that and then-

4 **LB:** -tabs?

5 **DY:** -if you sh-, if you go under-

6 **SC:** Property, it should be under property, yeah.

7 **DY:** If I go like this?

8 **SC:** So find that at-, the item.

9 **DY:** Yeah, target, does it, um-

10 **LB:** Find the same date and time as the one that says it was-

11 **SC:** Disposed.

12 **LB:** -disposed.

13 **DY:** I don't know if it's in there.

14 **SC:** Oh, 103A-

15 **DY:** That's not in there.

16 **LB:** It's not a time in there.

17 **DY:** Okay, so this is what I want to show you guys.

18 **SC:** What the, I'm so confused.

19 **DY:** So un-, under the property room history-

20 **SC:** Uh huh.

21 **LB:** Mm hmm.

22 **DY:** -I told Andrea, I said what is this-

1 **LB:** Mm hmm.

2 **DY:** -and she says well this is everything we do on the back end of the house with-

3 **SC:** Oh.

4 **DY:** -with P and E-

5 **SC:** The location.

6 **DY:** -okay?

7 **SC:** Okay.

8 **LB:** So it was in locker one.

9 **DY:** And I said okay, so anytime any evidence item is moved how does that look and

10 she says well we have a scanner and we doot, and we move it over to wherever

11 we're gonna do-

12 **LB:** And then scan where it's in now.

13 **DY:** -and scan it where it's at. So-

14 **LB:** Out of shelf four and onto shelf five-

15 **DY:** Correct so-

16 **LB:** -or whatever.

17 **DY:** -remember what I'm thinking now-

18 **SC:** Uh huh.

19 **DY:** -about the tape and everything, nowhere since April to October, item 104 has been

20 scanned.

21 **SC:** Has not been?

22 **DY:** Has not been. It was never scanned. Not in the-

1 **SC:** And that's-

2 **DY:** -property room history or anything. So what it tells me is at least in the system it

3 doesn't show anyone moved the item.

4 **SC:** Touching it, uh huh. Yeah.

5 **DY:** Which is weird, right?

6 **SC:** Yeah it is.

7 **DY:** So that's why this is all just such a-

8 **LB:** Well yeah, I mean it could sit-

9 **DY:** -a mystery.

10 **LB:** -in the same spot though.

11 **SC:** Well because the tape applied.

12 **DY:** Well yeah, I guess if someone-

13 **LB:** So what I'm saying is when it-

14 **DY:** -messed with it there-

15 **SC:** Oh-

16 **LB:** -when it first-

17 **DY:** -in place.

18 **LB:** -or when it first came back in on-

19 **DY:** Yeah.

20 **LB:** -on Ap-, in April-

21 **SC:** April.

22 **LB:** -when it first comes in-

1 **DY:** So when-

2 **LB:** -if, if they take it and they're like oh this thing is like starting to, the seam-

3 **DY:** Yeah.

4 **LB:** -is starting to go-

5 **SC:** Yep.

6 **DY:** Yeah.

7 **LB:** -they throw a piece of tape and literally put it where it goes and then it doesn't get

8 touched again until it gets checked out again in-

9 **DY:** Right.

10 **LB:** -2018.

11 **DY:** Right.

12 **SC:** When did we move-

13 **LB:** Then it wouldn't show any movement. So it was, literally when you returned it on

14 April 26th, right?

15 **DY:** Yeah.

16 **SC:** And 2017 is when the audit was.

17 **LB:** 'Cause yeah, you gave it to Kathy and then-

18 **DY:** Was it?

19 **LB:** -you returned it.

20 **SC:** 2017 was when we had the last audit as well.

21 **DY:** When, do you know?

22 **SC:** No.

1 **LB:** I don't know the date range in 2017.

2 **SC:** No, but I can ask-

3 **LB:** But I'm just wondering-

4 **SC:** -Jennifer.

5 **LB:** -if when it was received back from Kathy if the packaging looked tattered, not s-,
6 like as though it was gonna break maybe, that edge of the envelope.

7 **SC:** Actually, you can look it up.

8 **LB:** And if, if somebody, it would make sense that our property room, based on-

9 **DY:** Mm hmm.

10 **LB:** -my, based on-

11 **DY:** Yeah.

12 **LB:** -Andrea's explanation, if somebody put a piece of tape and then put it back on the
13 shelf.

14 **DY:** Mm hmm.

15 **LB:** But we don't know who would have done that.

16 **DY:** We don't know.

17 **LB:** Does it show who put it back, who took it in on that date?

18 **DY:** I'd have to look. I think it's Andrea.

19 **LB:** Andrea was-

20 **DY:** Yeah.

21 **LB:** -like she's the one who was-

22 **DY:** I'm pretty-

1 **LB:** -scanning it to-

2 **DY:** -I'm pretty sure.

3 **LB:** -wherever it went to?

4 **DY:** I'm pretty sure.

5 **LB:** Okay.

6 **DY:** So we had, and from what I can remember, we had Lori, Andrea, Bruce Gillum,
7 Mike Smith, and Casie Phillips during that time.

8 **LB:** During that time?

9 **DY:** Mm hmm.

10 **LB:** Well, and then Elizabeth Raisor-

11 **DY:** Raisor was fired-

12 **LB:** -which-

13 **DY:** -and would have had nothing to do with it at that point 'cause she would have been
14 long gone.

15 **LB:** And if Lori, so if that point in time Lori would have, if she was still here, she's the
16 supervisor and if that's their standard operating, if the packaging is like-

17 **DY:** Mm hmm.

18 **LB:** -needs a piece of tape-

19 **DY:** Right.

20 **LB:** -to hold it together. Maybe you remember this maybe you don't, I seem to recall
21 years ago, didn't we have an issue with some of our tape? Like it was-, like
22 remember we ran out of the-

1 **DY:** Yeah.

2 **LB:** -the, the-

3 **DY:** Yeah.

4 **LB:** -candy, like the true-

5 **DY:** 'Cause they, they wanted to get rid of that or something, right, or something like

6 that?

7 **LB:** I think somebody just didn't order the good stuff and then it-

8 **DY:** Yeah.

9 **LB:** -do you remember the tape not being real secure and like they-

10 **DY:** I don't, no. No, idea.

11 **LB:** I'd probably have to go all the way back to ask-

12 **DY:** Dude, we're talking nine years ago now.

13 **LB:** I know.

14 **SC:** Mm hmm.

15 **DY:** Yeah, I have no clue.

16 **LB:** Okay, well either way-

17 **DY:** Yeah.

18 **SC:** I don't know. I just know the last one was done in 2017-

19 **DY:** Mm hmm.

20 **LB:** Yeah.

21 **SC:** -um 'cause I had looked it up just 'cause policy says-

22 **DY:** Let me see-

1 **SC:** -we were look-, talk, talking about audits.

2 **DY:** -let me see who uh-

3 **LB:** Do we have enough from, do we have any more questions for him?

4 **SC:** Uh did you talk to anybody else in property or just Andrea?

5 **DY:** I talked to Carl. Um-

6 **SC:** Okay.

7 **DY:** -I'm trying to remember when that was.

8 **LB:** Was it about this same stuff?

9 **DY:** I, yeah I said, I think I asked him the question, I don't remember when it was, it
10 might have been the same day or something.

11 **SC:** Okay.

12 **DY:** And it was just a, one question, Carl um, or no maybe he just told me 'cause he
13 overheard it or something.

14 **SC:** Mm.

15 **DY:** He goes yeah, we, we can change the times on the back end.

16 **LB:** Okay, so he said they-

17 **SC:** Okay, so that's what brought-

18 **DY:** Yeah.

19 **SC:** -that forward?

20 **DY:** Yeah.

21 **SC:** Okay.

1 **DY:** Um the oh, the other thing too, so as I'm calling, I'm talking to Andrea on the
2 phone about the repackaging and stuff. I said hey, I got one, I got one more for you
3 Andrea. I said uh are you, can you change the times and the dates on the back end
4 and she says yes. I was like oh man.

5 **SC:** Wow.

6 **LB:** Which, yeah.

7 **DY:** So they can not only change the time, they can change, put in a completely
8 different date in there.

9 **LB:** They can, yeah.

10 **SC:** Gosh dang.

11 **DY:** Or maybe accidentally do something.

12 **SC:** Accidentally, yeah.

13 **DY:** Like, I don't know.

14 **LB:** Yeah, you didn't just select the wrong, if-

15 **SC:** Either way, the opportunity is there.

16 **DY:** Correct.

17 **LB:** So understanding of that then, so there's a ma-, there's a ability or a manual entry
18 process which leaves-

19 **SC:** Yeah, 'cause they have administrative rights.

20 **LB:** -it, it could leave room for both human error but also manipulation if somebody
21 was-

22 **SC:** Manipulation-

1 **LB:** -trying to.

2 **DY:** Exactly.

3 **SC:** Totally.

4 **LB:** Okay.

5 **SC:** Um so this was the first time you realized we have an issue with this case?

6 **DY:** Well I mean I kind of, I kind of-

7 **SC:** Well you caught it in-

8 **DY:** -I kind of caught it in May but-

9 **SC:** -May, yeah. Not the magnitude-

10 **DY:** -for me it kind of made, what she explained to me at the time, I'm like okay that's

11 a, that's a mistake-

12 **SC:** Yeah-

13 **DY:** -you know, like that's-

14 **SC:** -yeah.

15 **DY:** -to me-

16 **LB:** Just like a fat finger of a time?

17 **DY:** -yeah, to me it could be explainable-

18 **LB:** It-

19 **DY:** -um-

20 **LB:** -it was supposed to 1p.m. but you put 1a.m., like something like simple like that?

21 **DY:** Right, right.

22 **SC:** Yeah, she was saying it was like a fat finger maybe-

1 **DY:** Yeah, I was like, yeah-

2 **SC:** -like-

3 **DY:** -she says oh maybe she fat fingered it-

4 **SC:** Mm hmm.

5 **DY:** -or whatever and so then it was quick, it was-

6 **SC:** Yeah.

7 **DY:** -well I didn't really jump and dive into a bunch of stuff.

8 **SC:** 'Cause it made sense.

9 **DY:** Right, and-

10 **SC:** Mm hmm.

11 **DY:** -and again, my chain of custody showed I think 1316 so I'm like oh, maybe-

12 **SC:** There's a one.

13 **DY:** -maybe it was just a fat finger.

14 **SC:** Right.

15 **DY:** And then um of course in my brain I'm thinking no one would do anything.

16 **SC:** Yeah, yeah.

17 **DY:** You know, like this is crazy.

18 **SC:** Right.

19 **DY:** This is, this is nuts that the defense is even bringing this up.

20 **SC:** Right.

21 **DY:** So right, so that's kind of how that happened. Um did you want to see who got the

22 item back?

1 **LB:** Yeah, who brought-

2 **DY:** Okay.

3 **LB:** -it on that April 26th-ish date.

4 **DY:** Let me see.

5 **LB:** And that was on item 10-

6 **SC:** 104A or no, 104?

7 **LB:** No, just the cell phone, Lisa's phone, so 104.

8 **DY:** Yeah.

9 **SC:** Mm hmm.

10 **DY:** Let me see.

11 **LB:** 'Cause that's the one with the candy cane tape.

12 **DY:** Mm hmm.

13 **SC:** Yeah.

14 **DY:** Yeah, I just, when I'm on the stand and this gets brought up-

15 **SC:** Ugh.

16 **DY:** -I just want to be able to say um we're looking into it.

17 **SC:** Mm hmm.

18 **DY:** And I don't, I, I didn't want to be the one that said yeah, I noticed that but I didn't

19 want to say anything.

20 **SC:** Yeah, right.

21 **LB:** Yeah, well you've brought it to attention and-

22 **DY:** Right.

1 **SC:** You did.

2 **LB:** -it's being inves-, it's being reviewed internally.

3 **DY:** Yeah, and that's where I'll leave it. I just-

4 **SC:** Yeah.

5 **DY:** -for my own piece of mind on the stand I wanted to be able to say yeah, I did see

6 that and, and it's being, it's being looking into.

7 **SC:** Right.

8 **LB:** So it's the section where it shows like where it goes onto the shelf, right?

9 **DY:** Yeah.

10 **LB:** Like everything you've said they do?

11 **DY:** Yeah, so ah there's so much stuff in this thing.

12 **LB:** Can you go just to that item number though, just to 104?

13 **DY:** Yeah. Uh, where is it at? Okay, there it is. So if you look right here.

14 **LB:** Mm hmm.

15 **DY:** Um-

16 **LB:** And this should then give us that page where it shows every step in and out?

17 **DY:** Yes.

18 **LB:** Whatever shelf it got put on?

19 **DY:** Yes. So if you look at the property room history, right?

20 **LB:** Is that in order by date?

21 **DY:** Yes.

22 **LB:** 'Cause some of them I notice are like out of order too.

1 **DY:** Were they?

2 **LB:** Yeah.

3 **DY:** Yeah. Um so we can see-

4 **LB:** When you get down to when you return it on the, in April, right?

5 **DY:** Yeah, but I just want to show you, you can see like from April 'til well, it looks
6 like it, interesting.

7 **LB:** Checked out on April 27th?

8 **DY:** No, do you see this one on nine, September 1st? Some-, the phone, it looks like
9 Lori-

10 **LB:** G61-

11 **DY:** -maybe did a movement with it.

12 **SC:** Of '17?

13 **LB:** Uh huh.

14 **DY:** 9/1 of 2017.

15 **SC:** When did we move property rooms?

16 **DY:** But look, 0420 in the morning.

17 **SC:** Oh my gosh.

18 **DY:** That's not, there's no way.

19 **LB:** I doubt she was there early in the morning but that's a long time ago, if they were
20 doing a property move. So then she does, the next entry says XXG61C but that's
21 in November.

1 **DY:** November. So, all right so we go down to chain of custody and if you look at, so
2 obviously the chain of custody is when the item is signed out or signed in.

3 **LB:** Mm hmm.

4 **DY:** What I showed you before is back house, in house.

5 **LB:** Within movement inside, right.

6 **DY:** Correct.

7 **SC:** Inside.

8 **DY:** So if you look here um let's do this. That's where you, I think that's what you were
9 talking about.

10 **LB:** Okay, yep. Yep.

11 **DY:** Okay. So see? April 27th-

12 **LB:** Returned.

13 **DY:** Yep, and then it was released on 10/17. So as far as chain of custody goes-

14 **LB:** It went into P and E on April 20-

15 **DY:** Stayed, and was never signed out until October.

16 **SC:** Mm.

17 **LB:** Now there could have been, up in the top, there could have been little movements
18 within P and E, changing location of the shelf it's stored on like as they make
19 room?

20 **DY:** Right.

21 **LB:** But it was in our care-

22 **SC:** I wonder if-

1 **LB:** -and custody during that time.

2 **DY:** Exactly.

3 **SC:** Can you see anything on Lori's side that maybe she added notes to that in
4 September?

5 **DY:** Yeah, let me see. I, we clicked on it-

6 **SC:** Maybe she added the tape-

7 **LB:** When he clicked there wasn't any-

8 **SC:** Oh.

9 **DY:** Let's see.

10 **LB:** Well you-

11 **DY:** So nine, so that, the only one would have been on my birthday which is
12 interesting. Um-

13 **LB:** There's no note?

14 **DY:** -it says disposal no, target disposal date. There's no notes.

15 **SC:** What, hmm.

16 **LB:** And I, we don't-

17 **DY:** And it's at 4:20 in the morning which-

18 **SC:** And-

19 **DY:** -is probably not an accurate time.

20 **SC:** So that would be just her moving it?

21 **LB:** It's, it just says-

22 **SC:** Don't, nobody knows.

1 **LB:** -G61, it just shows the location.

2 **DY:** The storage location and then the next-

3 **LB:** But it was in G61 prior to that by Andrea on April 21st. It was still in that-

4 **DY:** Yeah.

5 **LB:** -same spot. But then see that next, so is that them doing an audit, just checking

6 that it was there?

7 **DY:** I wonder. I don't know.

8 **LB:** And do they scan it that it's here?

9 **DY:** Yeah, maybe.

10 **SC:** That's why I want to find out when the audit was.

11 **DY:** Mm hmm.

12 **LB:** When the audit was 'cause that's in, yeah.

13 **SC:** 'Cause Jennifer did tell me but-

14 **LB:** So that date for Lori, for our notes is September 1st, 2017 and that, and it shows

15 Lori.

16 **DY:** Hmm, yeah.

17 **LB:** September 1st, 2017 at 4:20 in the morning. Okay. Uh any more questions or is

18 that-

19 **SC:** Um, no. Oh well so the only other question I have is you've obs-, obviously

20 worked a good amount of serious cases-

21 **DY:** Mm hmm.

1 **SC:** -with your time here and you're, where you're, where you're at. Have you had any
2 other property issues or have you know, when you've gone to trial?

3 **DY:** No. No.

4 **SC:** Okay. This is-

5 **DY:** Huh uh.

6 **SC:** -a first for you.

7 **LB:** This is the first time you've ever seen-

8 **DY:** Oh I like-

9 **LB:** -like issues like this?

10 **DY:** Absolutely. Um-

11 **SC:** Yeah, okay.

12 **DY:** -I will say that none of my homicides ever went to trial.

13 **SC:** Okay.

14 **DY:** They were all plead.

15 **SC:** Okay.

16 **DY:** Um-

17 **LB:** How about any of, of, have you had any other serious cases like sex assaults,
18 violent, any-

19 **DY:** Huh uh.

20 **LB:** -armed robberies, violent things, things that would be really, that have gone to trial
21 where they-

22 **DY:** No.

1 **LB:** No.

2 **DY:** That there was an issue with evidence? No.

3 **SC:** Okay.

4 **DY:** I can tell you that this, the only reason, well actually I brought this up.

5 **SC:** Mm hmm.

6 **LB:** Yes.

7 **DY:** So um but I can tell you I had a strong feeling that the defense was onto this-

8 **SC:** Mm hmm.

9 **DY:** -based upon that defense interview.

10 **SC:** Right.

11 **DY:** And then based upon what was, what's been talked about in a round about way in

12 trial with other witnesses.

13 **SC:** With the phone-

14 **DY:** I'm smart enough to know-

15 **SC:** Mm hmm, yeah.

16 **DY:** -some, s-

17 **LB:** They picked up on-

18 **SC:** You know what's coming.

19 **LB:** -subtle things that-

20 **DY:** -they, they knew something was wrong.

21 **SC:** Yeah.

22 **LB:** Well and if you print the chain of custody and it shows these weird times-

1 **DY:** Yep.

2 **LB:** -like property rooms-

3 **DY:** Yep.

4 **SC:** Right.

5 **LB:** -running at one in the morning-

6 **DY:** Yep.

7 **LB:** -it would start to probably hey, we need to figure out why this-

8 **DY:** Uh huh.

9 **LB:** -this, this. Okay.

10 **SC:** All right.

11 **DY:** Yeah. But yeah, I, I guess the biggest take aways for me were Andrea said that this

12 had been going on for years-

13 **SC:** Mm hmm.

14 **DY:** -with these erroneous times and I'm going oh my god.

15 **LB:** Okay.

16 **SC:** Since the new system that we got I think, right?

17 **DY:** Well no, it was in, she said it was more in New World, so years ago.

18 **LB:** Even before the transition.

19 **SC:** Really?

20 **DY:** Yeah. And then she, she made it sound like to me that it got cleaned up when they

21 went to RMS-

22 **SC:** Oh.

1 **DY:** -and maybe she just didn't see it-

2 **SC:** Maybe not.

3 **DY:** -as much with RMS or whatever and then that's when I showed her that, that April

4 2025-

5 **SC:** Mm hmm.

6 **DY:** -when she signed out the bulk items. I go-

7 **SC:** Yeah.

8 **DY:** -uh look Andrea it's 0300 again.

9 **SC:** Mm hmm.

10 **DY:** And she goes oh man it's hap-, it's still happening.

11 **SC:** Gosh, okay.

12 **DY:** Yeah. So-

13 **SC:** I don't have anything, do you have anything else?

14 **LB:** No, thank you Noah. I think-

15 **DY:** Then if, well obviously-

16 **LB:** -we've got enough-

17 **DY:** -if you guys have more just let me know.

18 **SC:** Okay.

19 **LB:** If anything else comes up-

20 **DY:** Yeah.

21 **SC:** Yeah.

22 **LB:** -that you think we should know just regarding this-

1 **DY:** Yeah.

2 **LB:** -will you please let us know?

3 **DY:** Yeah, I'll let Sarah know.

4 **SC:** Okay.

5 **LB:** Okay.

6 **DY:** If that's all right?

7 **LB:** Yep.

8 **DY:** Um-

9 **SC:** Do you wanna go off?

10 **DY:** Yep or whatever-

11 **SC:** Do you got anything else?

12 **DY:** I think that's it.

13 **SC:** Yeah?

14 **DY:** Hopefully that's all.

15 **SC:** Okay.

16 **DY:** Hope-, yeah.

17 **LB:** Thank you Noah.

18 [END OF AUDIO]

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CERTIFICATE

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I, STEPHANIE L. CONTOS, Transcriptionist, do hereby certify that the foregoing pages 1-98 constitute a full, true, and accurate transcript from an electronic recording of the proceedings had in the foregoing matter, all done to the best of my skill and ability.

Signed and dated this 8th day of March, 2026

(s) STEPHANIE L. CONTOS

EXHIBIT B

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Interview of Jennifer Calovini
Administrative Investigation - AI2026-0001
January 22, 2026

Participants:

SC – Sergeant S. Cannon

LB – Lieutenant J. Bayer

JC – Jennifer Calovini

1 **SC:** All right, it's January 22nd and it is 3:30p.m. This is Sergeant Cannon, AI2026-
2 0001 and I'm with Jennifer Calovini and Lieutenant Bayer.

3 **LB:** Mm hmm, badge number 1208.

4 **SC:** And mine is 1155. You don't have badge numbers, right? Do you?

5 **JC:** Uh I do but I don't know what it is.

6 **SC:** Okay.

7 **JC:** They changed it and I don't know what it is now so-

8 **SC:** Okay. So this is just basically the notice of investigation, which you're just a
9 witness and I'll just read this first part to you. An administrative investigation is
10 being conducted into allegations of misconduct and or operational actions in
11 violation of city and or department policy. It is believed that you may have
12 information regarding the following alleged incident on January 14th, 2026. I need
13 glasses. It was discovered that items involving property and evidence and the
14 packaging slash handling of evidence in case number 17-6390 may have been
15 improperly handled. And then this is, just goes, have you seen these before?

16 **JC:** Yeah.

17 **SC:** Okay.

18 **JC:** Yeah.

19 **LB:** So basically who you, who you can talk to and what you can and can't do and we
20 can provide you a copy of that as well.

21 **SC:** Yeah, I'll give you one when we leave.

22 **JC:** Okay.

1 **LB:** And the biggest thing for integrity of the investigation is don't talk to anybody
2 other than who is listed on there.

3 **JC:** Yes.

4 **LB:** Unless it's related to the official investigation, meaning if we're calling you in we
5 can continue to ask you questions.

6 **JC:** Okay.

7 **SC:** Thank you. Uh I just said it, January-

8 **LB:** The 22nd.

9 **SC:** -yeah. Thank you. All right, so just to clarify how long, excuse me, what is your
10 position at the police department?

11 **JC:** Uh support services manager.

12 **SC:** Okay. And what does that entail?

13 **JC:** Uh overseeing uh property and evidence records, municipal security and
14 administrative functions.

15 **SC:** Okay. And how long have you been here doing that?

16 **JC:** Uh officially I have been in that position since probably August of 2025.

17 **SC:** Okay, and what were you doing before?

18 **JC:** I was an administrative services manager doing the same thing.

19 **SC:** Okay.

20 **JC:** Since 2023.

21 **SC:** Since 2023?

22 **JC:** Sorry, 2024, when Issitt showed up.

1 **LB:** Okay.

2 **SC:** Okay. Anything before that here?

3 **JC:** Um, I was an MA but I wasn't over these units before that.

4 **SC:** Okay. Okay. So regarding this issue that we're talking about, this, this case
5 number, can you let me know, can you just explain to me how you were made
6 aware of these issues that came up regarding the property and, and evidence?

7 **JC:** I received a phone call from chief the night of the 14th. I don't remember the time.
8 I can look it up.

9 **SC:** Okay.

10 **JC:** Um, and he called and asked if anybody had talked to me. Um, I told him no and
11 then he proceeded to tell me that he had talked to Noah Yeo and had been told that
12 there were issues with Noah's case. And then he proceeded to tell me vaguely
13 what was going on.

14 **SC:** Okay.

15 **JC:** Um, I hung up the phone from him and I tried to call Brad and I couldn't get
16 through to Brad so I called Jared Lowe (sp?). Jared gave me bits and pieces of
17 information and then I called Brad. I got more information um and then we all
18 agreed that they would meet with Noah and we would meet the next morning at
19 eight and Noah would kind of brief us all so we had kind of the same information.

20 **SC:** Okay. All right.

21 **JC:** Um-

22 **SC:** And so what, what possible issues are we looking at?

1 **JC:** So from what I have seen um and violating policy, I would say they have
2 procedures at P and E that are not documented and I think that's the issue.

3 **SC:** So it's just a um-

4 **JC:** They're operating outside of their SOP's.

5 **SC:** Okay.

6 **JC:** Um, so they, there are, and I, I cannot say that they're Andrea other than the fact
7 that the audit logs from the system have her name.

8 **SC:** Okay.

9 **JC:** So the audit logs where uh Detective Yeo said that um there is a timestamp on a
10 piece of evidence that he knows he was not there. If you look at the audit log um it
11 says that it's at 3a.m.

12 **SC:** Mm hmm.

13 **JC:** There was a release to Noah I believe at 3a.m. If you look at the audit logs, that
14 was actually entered by Andrea at 6:08 the following morning.

15 **SC:** Eight, okay.

16 **JC:** So she modified the evidence log for some reason and there's no documentation,
17 either through a supplemental, through a status note, that I can find. She may have
18 an activity note or something that I haven't located yet-

19 **SC:** Okay.

20 **JC:** -but there's nothing there that says why that was entered and it's on several of
21 those pieces of evidence. So it's like she did a mass update for that case and I
22 don't, I don't know why.

1 **LB:** What day are those changes or those audit logs, are they all, did, did this all occur
2 on the same day?

3 **JC:** So for all of those changes they occurred, the change was to May 29th, 2025 at
4 3a.m. When the data was entered was May 30th at 6:08.

5 **SC:** And was she getting these items for Noah for the case or do we know?

6 **JC:** (INDISCERNIBLE)-

7 **SC:** We don't know, okay. Sorry. Um so this is on um, so this is one of the issues,
8 right?

9 **JC:** Yes.

10 **SC:** And that, and basically and just, I'm just doing this for my own understanding, um
11 she basically got these pieces of property that were involved in this case, right?

12 **JC:** Yeah.

13 **SC:** And it shows in the system at 3a.m. it was reentered?

14 **JC:** No I, it, what it shows is that it, it was in-, she received an intake from Noah-

15 **SC:** Oh.

16 **JC:** -into evidence.

17 **SC:** And this is in 2025.

18 **JC:** Right.

19 **LB:** At three in the morning.

20 **JC:** At three in the morning.

21 **LB:** It shows intake.

22 **JC:** Yes.

1 **LB:** And then at-

2 **JC:** I'm gonna pull it up just-

3 **LB:** -6:08-

4 **JC:** So what the audit log shows is that that entry for that intake was actually made on
5 May 30th, 2025 at 6:08a.m. So the question came up, why is P and E allowed to
6 change or enter date and times. Like why are we not using the scanner? Why are
7 we not-

8 **SC:** Mm hmm.

9 **JC:** -and after speaking with other people down there, that's just not their practice.

10 **SC:** Okay.

11 **JC:** So-

12 **LB:** That's not their practice to use the scanner or-

13 **JC:** Correct.

14 **LB:** Okay. They're manually putting it in.

15 **JC:** They're manually putting it in.

16 **LB:** Okay.

17 **JC:** Now the system, we have also confirmed with Tyler Unit or Tyler Technologies,
18 that when they do a mass update, so for example, if they are checking in three
19 pieces of evidence and they use a scanner, boop, boop, boop.

20 **LB:** Mm hmm.

21 **SC:** Mm hmm.

22 **JC:** When you do a mass push to upload from the scanner into RMS-

1 **LB:** Mm hmm.

2 **JC:** -the system will not take the dates and times from the scanner. The tech has to
3 manually enter this is when it was done. I'm not sure that applies to this because
4 it's still, I, she didn't do it at three o'clock in the morning so I do not know why
5 she put that that occurred at three o'clock in the morning.

6 **SC:** Okay. Um-

7 **LB:** Is that for one item at three in the morning or was it for-

8 **JC:** No, it was three.

9 **LB:** Three items?

10 **JC:** Three that I checked. So it's um the evidence that I checked was 20077 which is a
11 Blackberry, 203258 which is the thumb drive and 200078 which is a white iPhone.

12 **SC:** So those are the three pieces of property identified as having issues with the intake
13 timeframe.

14 **JC:** That's, yeah.

15 **SC:** Okay.

16 **JC:** That's what Noah brought forth.

17 **SC:** And has there been any other issues regarding this case and its property that
18 you've found?

19 **JC:** So, the other thing that was brought up um was that 0-, 203258-

20 **SC:** Mm hmm.

21 **JC:** -was showing that it had been destroyed when it was actually still in evidence.
22 Um, I have um, we have somebody doing an inventory, an entire inventory. She

1 had noted on November 26th of 2025 as part of her inventory there is an entry that
2 says uh evidence is destroyed, still showing in, still showing in system. And then
3 another entry right after that that says evidence has been located was
4 inappropriately marked as destroyed.

5 **SC:** Okay.

6 **JC:** So what I have, we haven't been able to find out why this is occurring but I have
7 been told by Andrea and we've been working with IT, that when we did the
8 transition from LERMS to RMS-

9 **SC:** Mm hmm.

10 **JC:** -February 13th of 2024-

11 **SC:** Mm hmm.

12 **JC:** -this has happened and they have been trying to find where this evidence is
13 inappropriately marked since then. So they were short-handed, they couldn't do a
14 complete inventory. Now that we have almost completed the inventory, we believe
15 that we have all of those corrected.

16 **SC:** Okay.

17 **JC:** But-

18 **SC:** But it's a system error.

19 **JC:** It's a system error, yeah.

20 **LB:** Okay, so it's saying, so that one showing destroyed but actually in evidence, this is
21 kind of my notes,-

22 **JC:** Correct.

1 **LB:** -that's a, you believe that's a system error?

2 **JC:** Yes, because they had been finding those-

3 **LB:** On other things-

4 **JC:** -frequently since 2024.

5 **LB:** Since that transition.

6 **JC:** Yes.

7 **LB:** Okay. Um, so based on the initial, is, does it seem like there's any, other than the
8 intake times being off like manually and maybe manipulated, is there, there's no
9 other issue with that thumb drive piece?

10 **JC:** No.

11 **LB:** Okay.

12 **JC:** No.

13 **SC:** Okay.

14 **JC:** Um, and then the other issue that Noah brought up was that on the cell phone um-

15 **LB:** There was two cell phones?

16 **JC:** There's a Blackberry-

17 **SC:** Blackberry-

18 **JC:** -and an iPhone.

19 **LB:** Okay.

20 **JC:** Um I, it's on I believe the Blackberry because that's 103. The iPhone is 104. Um,
21 103 um looks like it had three ex-, extractions done on it. There are initials and
22 dates on all three of those extractions but between the second extraction and the

1 third extraction, there is a piece of candy cane forensics tape that's on there that
2 had-

3 **SC:** On-

4 **JC:** -on the envelope-

5 **SC:** Okay.

6 **JC:** -that has no-

7 **SC:** Initials?

8 **JC:** -initials, dates, serial numbers, nothing, um shield numbers, nothing. And there's
9 nothing in the case notes anywhere that says what was done, why, why is that tape
10 there.

11 **SC:** Mm hmm.

12 **JC:** Um-

13 **LB:** So, do we have any idea who would have taped it or is that, is that an up in the air
14 completely?

15 **JC:** That's an up in the air. We don't know. So that would be something that I think
16 they would have to talk to Andrea about.

17 **LB:** Okay.

18 **JC:** Between that and why would you put something in at three o'clock in the morning
19 on this. Nobody was here to do that.

20 **SC:** And when you say extracted, you're talking about the cell phone, right?

21 **JC:** The cell phone dump.

22 **SC:** So the dumps-

1 **JC:** Yes.

2 **SC:** Is it possible that whoever did the dump on the phone would repackage it?

3 **JC:** Well according to, to Noah, during, when I was talking to him, there are initials

4 and dates from the third-

5 **SC:** From those times?

6 **JC:** -detective that did that extraction.

7 **SC:** Okay.

8 **JC:** But there's this other piece of tape that's on there.

9 **SC:** It's added.

10 **JC:** Yes.

11 **SC:** Okay, okay.

12 **JC:** Yep.

13 **SC:** Got it.

14 **LB:** Have you seen that actual packaging?

15 **JC:** I have not seen it.

16 **LB:** Okay.

17 **JC:** It's at court so-

18 **LB:** Okay.

19 **SC:** Mm.

20 **JC:** -yeah. At least it's checked out to the court in the system.

21 **LB:** Okay.

1 **SC:** Are there any other items you've found, 'cause I know you guys have been
2 looking ever since you found this or found this out. Any other issues like that as
3 far as people actually touching things and not um documenting or initialing the
4 packages that they're handling?

5 **JC:** We haven't but we also are trying to preserve what's going on with Andrea so we
6 haven't-

7 **SC:** Gotcha.

8 **JC:** -blatantly been doing that. Um Trent is supposed to be targetingly asking so, what
9 do you do if you find a damaged package 'cause-

10 **SC:** Mm hmm.

11 **JC:** -he's the new guy.

12 **SC:** Okay.

13 **JC:** Um, I have not had a chance to talk to him 'cause he's only been there for-

14 **SC:** A week?

15 **JC:** -a day.

16 **SC:** Yeah.

17 **JC:** So, um my plan is to call him tomorrow and have him kind of give us a dump on
18 that.

19 **SC:** So-

20 **LB:** Okay.

21 **SC:** -we're looking at basically a system, a possible system error, right?

22 **JC:** Mm hmm.

1 **SC:** And um but also possible procedural or procedural errors by property technicians?

2 **JC:** Correct. If they are, if, if their practice, which was indicated in Noah's supplement,

3 if it is practice that they maintain the evidence that's in their custody, which

4 includes repackaging or doing-

5 **SC:** Mm hmm.

6 **JC:** -whatever, um then not initial and dating it should be in their procedure. But right

7 now, there's, I can't find anything that talks about them doing anything with the

8 evidence so I would assume that they are following the property and evidence

9 standards which require, or procedure, which requires a date and initial-

10 **SC:** Okay.

11 **JC:** -at a minimum.

12 **SC:** We'll get to that too. Um so this case happened in 2017 obviously, right um

13 Andrea was not the supervisor then, right?

14 **JC:** No, she was not.

15 **SC:** Was it, do you know who it was?

16 **JC:** I think it was Lori Ohrt.

17 **SC:** Okay. Were these issues, okay so sorry, still, still on the property stuff. The uh, the

18 system errors and the technical like property manipulation, do we know all the

19 timeframe? Like was it back in '17 or was it in 2025 like when the property was

20 um misdocumented in the system? Was it all 2025 or do we know?

21 **JC:** So from what I've been able to see going through the audit logs it looks like that

22 change was in 2025. I haven't gone back and looked closely-

1 **SC:** Okay.

2 **JC:** -at 2017 um-

3 **SC:** Okay.

4 **JC:** -but my quick review is there wasn't a lot of activity.

5 **SC:** Okay.

6 **JC:** There was a lot of checking out, checking in and then-

7 **SC:** Mm hmm.

8 **JC:** -it just sat for-

9 **SC:** Okay.

10 **LB:** Waiting for trial-

11 **JC:** Right.

12 **LB:** -presumably or whatever.

13 **SC:** And that's just this case.

14 **JC:** Right.

15 **SC:** Okay. Um-

16 **LB:** Um can I ask a follow up question on that?

17 **SC:** Yeah.

18 **LB:** So we have the dates on May 29th and May 30th kind of with her manually entering

19 the times. The, the, that additional candy cane style tape that was added, do we

20 have a window for when that would have occurred, like between the, do we know

21 when that was put on or is that completely-

1 **JC:** Um so we, we would have a timeframe. Um I can look up the dates from when the
2 second and third extraction. It would be sometime in, in that-

3 **LB:** In there?

4 **JC:** -timeframe.

5 **LB:** Okay. But from your check though, there's nothing that you can see documented
6 in RMS-

7 **SC:** That somebody had-

8 **LB:** -related to that property item on why that new tape went on.

9 **JC:** Correct.

10 **LB:** Okay, does, and you haven't inspected it. Was there, did Noah say or has anybody
11 said anything about were any of those other, the tape on there like prior and then
12 this kind of in between I'm guessing (INDISCERNIBLE)?

13 **JC:** That's what it looks like, yes-

14 **LB:** Does it-

15 **JC:** -according to what Noah said.

16 **LB:** -does it appear that any of that was tam-, does I guess was it tampered with? Like
17 was that tape put on to try to conceal do you believe something?

18 **JC:** I don't-

19 **LB:** Or it's-

20 **JC:** -I don't know.

21 **LB:** Okay.

22 **SC:** Okay.

1 **LB:** So it's going to be sometime between the second and third extractions-

2 **JC:** Right.

3 **LB:** -is when that went on there.

4 **JC:** Right.

5 **LB:** Okay.

6 **SC:** Okay.

7 **JC:** There is also um there is also the allegation from the defendant saying that her cell
8 phone was tethered which basically means it made connection to the internet-

9 **LB:** Mm hmm.

10 **JC:** -um on I want to say it was June 27th of 2017. Um according to Noah, the tape
11 would have been applied during that timeframe because it happened between the
12 two extractions. So that is what's elevating the concern is they're saying on
13 Facebook she posted that her phone had tethered, what were we doing, and we
14 have this piece of tape that nobody can explain.

15 **SC:** Oh okay.

16 **LB:** Are you able to look up the, the date range between the two te-, uh the extractions?

17 **JC:** Yep.

18 **LB:** Has that been confirmed as, do you know, that it actually did tether? I know she's,
19 she is saying but did we confirm that? Like did the third extraction confirm or
20 deny?

21 **JC:** I don't, uh from the way Noah was responding I would say no, it hasn't been
22 looked at. Um-

1 **LB:** Okay.

2 **JC:** Hold please. Okay. So I'm showing, I'm going to check the other piece of
3 evidence 'cause when he, he's talking he's talking about cell phones and I get
4 confused which one he's talking about. So the iPhone was released, it looks like it
5 was released in October of 2020 and then in-, intaked after that and then the next
6 time it was released was the 29th of 2025.

7 **LB:** Uh what month of-

8 **JC:** And then it was-

9 **LB:** -in 2025?

10 **JC:** It says that it was released to Noah on 2020, on May 29th of 2025. But there's no
11 return, that he returned it which is weird.

12 **LB:** No return of the phone?

13 **JC:** Huh uh.

14 **LB:** Do we know where that's at?

15 **JC:** Well-

16 **SC:** When did the trial start?

17 **JC:** -what I'm wondering is, it shows that it was released, I'm wondering if she got a
18 date and time wrong because it was released to him at 9:35 on May 29th, 2025 and
19 then she shows an intake that she entered on 5/29/2025 at 3a.m. and that is the
20 intake from Noah. So I'm wondering if she's got a date and time wrong because
21 she manually entered it.

22 **LB:** So it was released on May 29th in the morning to him?

1 **JC:** Yes.

2 **LB:** At like 9:35?

3 **JC:** Yes.

4 **LB:** But she shows that she intaked it at three in the morning?

5 **JC:** Yes. So she intaked it before she gave it to him.

6 **LB:** Hmm.

7 **SC:** That's-

8 **LB:** So let me look up the other one.

9 **SC:** That's weird.

10 **LB:** Yeah.

11 **JC:** That's why it's, yeah.

12 **SC:** Mm.

13 **JC:** We looked at-

14 **LB:** So we don't know when he actually returned it then.

15 **JC:** Right.

16 **SC:** Mm hmm.

17 **JC:** Unless it's in one of his supplements.

18 **LB:** But did, then she has a return, did she have another intake entry at, on May 30th at

19 6:08 in the morning?

20 **JC:** No. That's in the audit log. I can pull and see when the 5/29 date was entered.

21 **LB:** Oh when that was entered.

22 **JC:** Yeah.

1 **LB:** Okay, so she entered the 5/29, 0300 time-

2 **JC:** At six in the morning.

3 **LB:** On the following day though.

4 **JC:** Yes. Yep.

5 **SC:** Oh my gosh.

6 **JC:** And this is also at a time when she was in there by herself and Carl was out-

7 **SC:** Mm hmm.

8 **JC:** -so-

9 **LB:** So is it possible that, that it was put inside a locker for her to put back in? Like
10 how would he return, so I guess I'm trying and maybe you don't know and we can
11 ask Noah as well, if he returns that phone to go back in so she sees when it
12 actually was deposited by him in like an electronics locker or something and then
13 she's collect-, so it actually was received into a locker at three in the m-, would he
14 have returned, I guess we don't, we'll have to ask him.

15 **JC:** Yeah, I don't know.

16 **LB:** Did he possibly return it at three in the morning and then she was doing, when she
17 went and collected it she's like well, it was actually arrived in, back in P.D.
18 custody at three in the morning but I'm entering it 'cause I just got to work-

19 **JC:** And it maybe should have been-

20 **LB:** -on May 30th.

21 **JC:** -5/30 instead of 5/29.

22 **LB:** Yeah.

1 **SC:** May 30th? Yeah.

2 **JC:** Yeah.

3 **LB:** Yeah. Okay. So there's, we don't know exactly-

4 **JC:** Right.

5 **LB:** -I mean but there's clearly inconsistencies-

6 **JC:** Right.

7 **LB:** -on what was going on here. And would that be alleviated from your

8 understanding if we were using the scanner-

9 **JC:** Yes.

10 **LB:** -instead of manual entries?

11 **JC:** Yes.

12 **LB:** Are you aware of any reason why they would not be using the hand held scanners?

13 **JC:** So because there were multiple items on the same time, the system will not, 'cause

14 we actually called them, the system will not allow you to use the scanner for

15 multiple, when you do a mass update.

16 **LB:** Okay.

17 **JC:** The process would just be changed is we don't do that anymore.

18 **LB:** Okay. Like scan one, put it in?

19 **JC:** Well you'd scan it, you know, finish your thing, scan it. 'Cause what you do-

20 **LB:** You'd j-

21 **JC:** -is you associate it with a case.

22 **SC:** Mm hmm.

1 **LB:** Yeah.

2 **JC:** You just do each one. It makes it longer and harder but-

3 **SC:** Mm hmm.

4 **JC:** -or we switch CAD systems that allows us to do that.

5 **LB:** To do multiple-

6 **JC:** Yeah.

7 **LB:** -okay. So that's like a system constraint. It's, it, manual entry because it doesn't

8 allow you to do mass entries-

9 **SC:** Multiple-

10 **JC:** Correct.

11 **LB:** -for them. Okay.

12 **JC:** Yep. And it's fairly common when you've got multiple pieces to-

13 **SC:** Mm.

14 **JC:** -scan them all at once and then upload it.

15 **LB:** Okay.

16 **SC:** But the system we have currently won't allow that.

17 **JC:** Correct.

18 **SC:** Mm.

19 **JC:** Without a manual enter of date and time.

20 **LB:** Which puts human factor-

21 **SC:** Yeah.

22 **LB:** -human-

1 **JC:** Correct.

2 **LB:** -er-, error could if they whatever-

3 **SC:** Yep.

4 **JC:** Fat finger it.

5 **LB:** -fat finger the wrong date or think it's the day before and they're just typing

6 quickly going through.

7 **JC:** Yep.

8 **LB:** Okay.

9 **SC:** Do you know of any other problems that we've had in the property division at all-

10 **JC:** So there was-

11 **SC:** -in the past?

12 **JC:** -an issue um and I don't have that case information in front of me, um Brad

13 brought me a ca-, an issue where Andrea was checking out two pieces of, it was

14 two weapons or multiple weapons, one was to Sydney, one was to Chessah (sp?).

15 When they looked in the system, they had both been issued out to Sydney. She

16 made an error. Um so when it got checked back in the chain of custody in the

17 system didn't show that it had gone to Chessah. Um I met with Andrea. I talked to

18 her about that. She openly admitted that she made the mistake, um said that she

19 was going to correct it and it was strictly she was overwhelmed 'cause she was the

20 only one down there.

21 **LB:** Okay.

22 **JC:** So we had that conversation that she would slow down-

1 **SC:** Mm hmm.

2 **JC:** -um because that's what you have to do so.

3 **LB:** Mm hmm.

4 **SC:** Right. But nothing major where it's been a major overhaul or-

5 **JC:** No, we haven't had, the only, I mean there was somebody there used, you know,

6 using gift cards or whatever for-

7 **SC:** Mm hmm.

8 **LB:** Years and years ago-

9 **SC:** Yeah.

10 **JC:** -yeah, years and years ago but nothing-

11 **SC:** Major-

12 **JC:** -nothing that I have heard of in the last five years and nothing since I've been

13 there.

14 **SC:** All right.

15 **LB:** Okay.

16 **SC:** How often does property get audited?

17 **JC:** Um so they get quarterly audits um by IA. Um that's usually a 25/25/50 um so it's

18 25 items out of cash and guns and 50 items out of drugs, um just looking to make

19 sure that it's there. There have been some minor issues where things are either uh

20 chronologically wrong in the same box or we've found them in other boxes. But

21 we've always been able to find every item before the audit is completed. Um those

1 have been going on, the last formal audit uh was 2017. Um standard is usually
2 around every two to, every three years.

3 **SC:** Mm hmm.

4 **JC:** Definitely when you have turn over. Um so like when Lori Ohrt left-

5 **SC:** Mm hmm.

6 **JC:** -there should have been audit to make sure everything was done.

7 **SC:** Mm hmm.

8 **JC:** Um annual inventories um are usually done annually. Um the last one hadn't, had
9 been done in 2022. Um that was a, I was told that was staffing. So as soon as we
10 got the third person that's been her job is to go through-

11 **SC:** Okay.

12 **JC:** -and complete that audit.

13 **SC:** Okay.

14 **LB:** And that's just the full annual inventory?

15 **JC:** Yes, making sure-

16 **LB:** And that's just making sure everything that shows in the computer system is
17 actually in the building?

18 **JC:** Yes.

19 **LB:** Where it's-

20 **JC:** And in the right-

21 **LB:** -or where it's-

22 **JC:** -in-

1 **LB:** -or where it's-

2 **JC:** Yeah, where it's supposed to be. Yep.

3 **LB:** And there's a current full inventory like going right now?

4 **JC:** It will be done by the end of January.

5 **LB:** End of January?

6 **JC:** Mm hmm.

7 **LB:** And that will be every item we have?

8 **JC:** Everything that's in there.

9 **LB:** Okay.

10 **JC:** Yep.

11 **LB:** But that's just checking presence-

12 **SC:** If it's there.

13 **LB:** -not how it was packaged necessarily.

14 **JC:** It's not comparing it, yeah, to procedure and it's not looking for damage or those

15 types of things.

16 **LB:** Okay.

17 **SC:** Okay. Does that happen? Do they do, do we do property checks like that? I don't, I

18 mean in general-

19 **JC:** So usually when-

20 **SC:** -not just us but-

1 **JC:** -they're in there move-, like they have to move stuff or they're reallocating,
2 they're checking for that kind of stuff. I would say normally during the annual
3 audit um-

4 **SC:** Mm hmm.

5 **JC:** -that's done. We didn't do that this year because it was a brand new person and I
6 don't know that she would know what to look for.

7 **SC:** Okay.

8 **JC:** So um I talked to Trent. We are going to go through and do that. Um so we'll-

9 **SC:** Okay.

10 **JC:** -make sure everything is checked.

11 **SC:** Okay.

12 **JC:** The question is what do you do if you find something that's not-

13 **SC:** Mm hmm.

14 **JC:** -then we're-

15 **SC:** Are there policies in, in place for property like on their end? I know that we have
16 ours as officers.

17 **JC:** They have SOP's, yeah.

18 **SC:** They have SOP's. Does it, does it clearly state like how to repackage if you have
19 to? What to ha-

20 **JC:** No.

21 **SC:** No step by step manuals-

22 **JC:** I mean, no.

1 **SC:** -on packaging anything?

2 **JC:** No. Yeah, that's one of the things that I've, I've been looking for and I can't, I
3 can't find it so.

4 **SC:** Right. Okay.

5 **JC:** I've found for missing property, how to intake it, how to move it, all of that. But I
6 have yet to find one that is on repackaging.

7 **SC:** Or even like, so, so say I just started in the property room and um I guess do they
8 just teach them what to look for when receiving property-

9 **JC:** Mm hmm.

10 **SC:** -because you know, but there's no standard that they should be following when
11 we-

12 **JC:** Well what they do is have them look at the officer's packaging manual and,
13 because that's how it needs to be packaged so-

14 **SC:** Okay.

15 **JC:** -the new people are taught-

16 **SC:** So that's what they use.

17 **JC:** -yeah, to look against that manual and if it doesn't meet that requirement then it
18 either gets rejected or-

19 **SC:** Okay.

20 **JC:** -whatever.

21 **SC:** Okay.

22 **JC:** Yeah, because-

1 **SC:** That makes sense.

2 **JC:** -technically they're not supposed to repackage something that an officer brings in
3 and is packaged-

4 **SC:** Yeah.

5 **JC:** -incorrectly. They're supposed to refuse it back to that officer.

6 **SC:** Right, okay.

7 **JC:** They're only responsible if it's in their custody-

8 **SC:** Mm hmm.

9 **JC:** -and it's got a hole or you know, the envelope is falling apart, that kind of thing.

10 **LB:** Okay.

11 **SC:** Uh are they required to attend any trainings before being hired, either as a property
12 technician or when they get promoted to a supervisor in property and evidence?

13 **JC:** So they are required to get their international association of property and evidence
14 certification within I believe a year of becoming a tech.

15 **SC:** Okay.

16 **JC:** Um as far as supervisors, I don't know. Um-

17 **SC:** Okay.

18 **JC:** -Andrea was here when I got here.

19 **SC:** Yeah.

20 **JC:** Um but I have, I had asked them and they had not been to a lot of training. Um I
21 don't believe their previous manager was big on that so, or supervisor I should
22 say.

1 **SC:** Okay.

2 **JC:** Um that has changed and we are finding things for them to go to so they can stay
3 on top of stuff.

4 **SC:** Learn.

5 **JC:** Yeah.

6 **SC:** Gotcha, okay.

7 **LB:** Uh supervisor-wise, jumping on that quick, so Lori Ohrt was a supervisor there
8 some time ago. Was there anybody in between Lori and then Andrea?

9 **JC:** No, not that I'm aware of.

10 **LB:** So it went from Lori being supervisor to Andrea-

11 **JC:** As far as I know-

12 **LB:** -as super-

13 **JC:** -yes.

14 **LB:** And do you remember the, you might have said, do you remember the date she
15 took over as supervisor?

16 **JC:** Um let me see if I can look it up, her date. I don't know off the top of my head.

17 **LB:** And while you're looking for that, off the top of your head, that formal audit that
18 was done in 2017, was there anything noted about our, the way we run our
19 property room as a city? Like-

20 **JC:** Um there were some findings, um recommendations. Um the 2012 audit had a lot
21 more. Um a lot of this was around uh security, making sure we had cameras in
22 place, um maintaining the video footage longer than we had, um adding scanners

1 so that they could be more efficient. But there was nothing like missing property
2 or there was no mention of packaging or anything like that.

3 **LB:** Okay.

4 **JC:** Huh uh. Now I don't know whether that was in the scope of what they were
5 supposed to look for but-

6 **SC:** Mm hmm.

7 **JC:** Um it looks like she was promoted on May 30th of 2021.

8 **LB:** And you're not aware if she went to any training specific to being the supervisor
9 after that date?

10 **JC:** I have no idea.

11 **LB:** Okay. And I, I know you, I think you were trying to look between second and third
12 extractions, sorry, jumping back. Did we find when those two were so we can
13 narrow the range on when that Blackberry may have been retaped in the
14 packaging?

15 **JC:** Yeah, when I was looking through the chain of custody I actually didn't see. I'm
16 assuming it went out to Noah but I'm not seeing anything.

17 **LB:** Noah, or Detective-

18 **JC:** I'm-

19 **LB:** -McCure maybe-

20 **SC:** Mm hmm.

21 **LB:** -to pull it and download it and-

22 **JC:** The only thing in the chain of custody that I'm seeing for, which one is this one?

1 **SC:** Hmm.

2 **JC:** This is the Blackberry. So the only thing that I am seeing, according to the chain of
3 custody in this system, nothing happened between August, or sorry, October of
4 2020 and May 29th of 2025. And then it was released to court in September of
5 2025. So there's no appearance of an extract-, like-

6 **SC:** Mm hmm.

7 **JC:** -another extraction.

8 **LB:** Okay so there's nothing logged that says when it came out for the second
9 extraction-

10 **JC:** No.

11 **LB:** -or came out for the third?

12 **JC:** That's what I'm looking at.

13 **SC:** Hmm.

14 **JC:** Looking at the cell phone-

15 **LB:** I wonder if there's supplements in the case that would have-

16 **SC:** Maybe.

17 **LB:** -indicated they checked out this property on this date. We'll have to-

18 **SC:** There should be.

19 **LB:** -look at that.

20 **JC:** Yeah it's the same thing for the cell phone. Those are, it's October 2020 and then
21 May of '29, or 2025.

1 **LB:** Okay, so it's, it looks like it sat untouched from October of 2020 until May 29th of
2 2025.

3 **JC:** Yes.

4 **LB:** Approximately.

5 **JC:** Approximately.

6 **LB:** And then ul-, ultimately was released to the court.

7 **JC:** Yes.

8 **SC:** And she's saying it tethered in June of 2017.

9 **JC:** Yes.

10 **SC:** Which was after-

11 **LB:** Is there any history-

12 **SC:** -the arrest.

13 **LB:** -between June of, June of 2017 to October 20th?

14 **JC:** So, so it got moved in September of 20-, 2017. It looks like it got moved. So this is
15 showing that it was checked out. This isn't making any sense. I'm gonna have to
16 look because there's three X's in front of the checked out and I don't know what
17 that means.

18 **LB:** Um would it be possible to either have you or if Trent knows how to do this yet, to
19 give us a timeline of like the-

20 **SC:** The items.

21 **LB:** -any movement of all three of those-

22 **JC:** Yeah.

1 **LB:** -property items? Like the actual full chain of custody like intaked on this, like and
2 I'm talking the whole time we've had it-

3 **JC:** Yes.

4 **LB:** -up to the point-

5 **JC:** Yeah.

6 **LB:** -that we've given it to the court?

7 **SC:** Yeah, good.

8 **LB:** Just so we can have exact-

9 **JC:** Yep.

10 **LB:** -what the system shows and we can cross reference that with any supplements or
11 reports maybe-

12 **SC:** Mm hmm.

13 **LB:** -that also reference it?

14 **JC:** So let me, so like for 2020-, for 77 which is 103 um which is the Blackberry, we
15 pulled an audit log um that shows everything that happened with it. So chain of
16 custody, it will say it was added by her computer so, I can't read, she did an
17 intake-

18 **SC:** Mm hmm.

19 **JC:** -code that was returned. Um here was an update to it. The old value is it went from
20 GE92 to investigations.

21 **SC:** Mm hmm.

22 **JC:** So is this what you're looking for or do you want it spelled out easier?

1 **SC:** I think I could figure that out because if it goes to Noah or investigations-

2 **LB:** If there's an-

3 **SC:** -there's gonna be-

4 **LB:** -if there is an easier way for us as-

5 **JC:** Okay.

6 **LB:** -novice-

7 **JC:** We'll spell it-

8 **LB:** -who don't look at that-

9 **JC:** -we'll spell it out for you.

10 **SC:** Yeah.

11 **LB:** Yeah, it would just-

12 **JC:** We'll spell it out, okay.

13 **SC:** Help is good.

14 **LB:** What, I mean obviously-

15 **JC:** That's good.

16 **LB:** -with that is obviously the support but just so we know-

17 **JC:** Yep.

18 **LB:** -like so we're not trying to guess how to read it.

19 **JC:** Okay, yep. I will put that together.

20 **LB:** Okay. Do you have more?

21 **SC:** Uh just the one-

22 **JC:** Do you want it for, sorry. Do you want it for-

1 **SC:** Uh huh.

2 **JC:** -the full case or do you just want it for the three pieces?

3 **LB:** Let's start with those three items-

4 **JC:** Okay.

5 **LB:** -because those are the items it sounds like we have questions about intake times,
6 release times, when things were put in, what-

7 **JC:** So there's another piece of evidence, 204706 that's just documents that Noah says
8 he's noticed through his investigation. I don't know whether it's the court
9 documents or whether it was brought up in the case-

10 **LB:** Mm hmm.

11 **JC:** -but there is another strip of this candy cane tape um and it has Casie Phillips's
12 initials on it and he can't find out-

13 **SC:** What-

14 **JC:** -there's no documentation as to why. So-

15 **LB:** Could you add that to the list-

16 **JC:** Yeah.

17 **LB:** -of property items then?

18 **JC:** Yeah.

19 **SC:** Hmm.

20 **LB:** So we have, should have four items?

21 **JC:** Yes.

22 **LB:** Any other do you th-, do you know of?

1 **JC:** That's all he has mentioned.

2 **LB:** All Noah has mentioned?

3 **JC:** Yes.

4 **LB:** Okay, so those four things. A Blackberry, a thumb drive, a wh-, I think you said a
5 white iPhone?

6 **JC:** Yes.

7 **LB:** And then those documents.

8 **JC:** Yep.

9 **LB:** Okay. Yeah, just chain of custody on those and explained here's the history with
10 us-

11 **JC:** Right.

12 **LB:** -and since-

13 **JC:** Right.

14 **LB:** Okay.

15 **SC:** Um did you have anything?

16 **LB:** No.

17 **SC:** Just the one about RMS. Have you had any other issues or concerns um that have
18 been brought to your attention since the merge?

19 **LB:** And I'll, and I'll try-

20 **SC:** I know that's, yeah-

21 **LB:** -and narrow the scope, specifically maybe, well I guess that would apply to this
22 particular case but it might also apply to others.

1 **JC:** So have noticed um that there are some dates and times where things are entered at
2 midnight. Property and Evidence doesn't work at midnight so maybe it was put
3 into a locker, maybe something else. But it's happening fairly frequently. So-

4 **LB:** That's it's registering a midnight entry?

5 **JC:** At midnight entry.

6 **SC:** Even still.

7 **JC:** I, I haven't looked-

8 **SC:** Oh okay.

9 **JC:** -recently. We identified that to Tyler-

10 **LB:** Okay.

11 **JC:** -Technologies last, this past week-

12 **LB:** Okay.

13 **JC:** -and said we need an explanation as to why that's happening.

14 **LB:** Okay.

15 **JC:** The other thing that if it's, if anybody starts digging into the system-

16 **LB:** Mm hmm.

17 **JC:** -we have also found that the system itself, because it logs as system, is actually
18 doing something that is logging a view on pieces of evidence, piece-, documents,
19 that type of thing. We've asked Tyler Technologies to please explain that because
20 it, the system shouldn't be registering anything whenever it's doing its processing.
21 It should just be doing it. It shouldn't be-

22 **SC:** Logging-

1 **JC:** -it shouldn't be logging in our audit logs that it's touching pieces of-

2 **SC:** Yeah.

3 **JC:** -property.

4 **LB:** Yeah.

5 **JC:** So um so those are more outstanding things that we're trying to find out.

6 **LB:** Did any of those issues, have you seen them specific to these four items so far?

7 **JC:** Yes.

8 **LB:** Okay. Where it's showing a view or-

9 **JC:** Yes.

10 **LB:** -an entry at midnight?

11 **JC:** Yeah I don't remember the entry at midnight but yeah, we do have quite a few

12 views.

13 **LB:** Does the view, the way it logs that, does it say like who? Like is it easy to tell that

14 it's the computer just-

15 **JC:** Yeah it, it shows that it's, let me see if the one that-

16 **SC:** Hmm.

17 **JC:** Yeah. This one doesn't have it but under user alias it will actually say like system.

18 Um it's not on this one but yeah-

19 **LB:** Oh okay. But it would say-

20 **JC:** Yeah.

21 **LB:** Okay. So it will say system so-

22 **JC:** Yeah.

1 **LB:** It does, it's, it, would you say that it's pretty obvious then that it's not actually-

2 **JC:** Oh yeah, so-

3 **LB:** -you?

4 **JC:** -here on the thumb drive it shows right here, inactive system, change something in

5 the global vehicle. Actually it added something. So we're trying to figure out like

6 what is it doing, why, why is this happening. And this is after the merge-

7 **SC:** Mm hmm.

8 **LB:** Mm hmm.

9 **JC:** -so we can't explain it as-

10 **SC:** Yeah.

11 **JC:** -now maybe they did, went in the back end and did something like hey we're

12 adding these vehicles as part of the s-

13 **LB:** Available choices for drop downs or whatever.

14 **JC:** Right, but we also, it, it shouldn't be doing that because-

15 **SC:** Mm hmm.

16 **LB:** Mm hmm.

17 **JC:** -this is in April far after the migration-

18 **SC:** Yeah.

19 **JC:** -was done-

20 **LB:** Yeah.

21 **JC:** -so there should be some log that it was-

22 **LB:** Okay.

1 **JC:** -somebody from Tyler or somebody from us was doing that.

2 **LB:** Okay.

3 **JC:** So-

4 **SC:** What am I missing?

5 **LB:** Uh is there anything, so you mentioned um Lieutenant Harden (sp?), Commander
6 Lowe, Detective Yeo, a group all meeting to go over-

7 **JC:** Mm hmm.

8 **LB:** Is everything kind of we talked about today, is that was basically this was all was
9 discussed-

10 **JC:** Yes.

11 **LB:** -in that meeting?

12 **JC:** Yeah.

13 **LB:** Okay. Do you recall anything else in that meeting that was brought up about this
14 case and these items?

15 **JC:** No, so I actually was late to that meeting um so I met with Noah on the 19th-

16 **LB:** Mm hmm.

17 **JC:** -and we just kind of went over some pointed questions about you know, which
18 was a thumb drive, what got tethered, 'cause we were trying to dig through to find
19 any kind of solution or something in the logs. Um so that's all that I'm aware of-

20 **LB:** Okay.

21 **JC:** -that was discussed. Sorry.

22 **LB:** Okay.

1 **SC:** Okay.

2 **LB:** I think for us, for now, that's it. Just if you can help us with the-

3 **JC:** Timelines.

4 **LB:** -the timelines-

5 **SC:** Mm hmm.

6 **LB:** -for each of the property items to show from start to finish for us.

7 **JC:** Mm hmm.

8 **LB:** And that way, we have that and then if we think of anything else or if anything

9 else comes up if you would let us know?

10 **SC:** Mm hmm.

11 **JC:** You know where I sit.

12 **LB:** Cool.

13 **SC:** Awesome.

14 **LB:** Okay.

15 **SC:** Thank you.

16 **LB:** Thank you.

17 [END OF AUDIO]

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CERTIFICATE

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I, STEPHANIE L. CONTOS, Transcriptionist, do hereby certify that the foregoing pages 1-42 constitute a full, true, and accurate transcript from an electronic recording of the proceedings had in the foregoing matter, all done to the best of my skill and ability.

Signed and dated this 10th day of March, 2026

(s) STEPHANIE L. CONTOS

EXHIBIT C

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Interview of Andrea Gamez
Administrative Investigation - AI2026-0001
January 15, 2026

Participants:

- UF1 – Unknown Female 1
- UF2 – Unknown Female 2
- UM1 – Unknown Male 1
- UM2 – Unknown Male 2
- UM3 – Unknown Male 3
- AG – Andrea Gamez

1 **UF1:** -chat?
2 **AG:** Can we chat?
3 **UF1:** Yeah, por favor?
4 **AG:** Yes ma'am.
5 **UF1:** Thank you.
6 **UM2:** (INDISCERNIBLE)-
7 **UM2:** Huh?
8 **UF1:** We just need a couple minutes.
9 **UM2:** (INDISCERNIBLE)-
10 **UM2:** Yeah.
11 **AG:** With me?
12 **UM2:** Yeah.
13 **UF1:** Yeah.
14 **AG:** Where do you need me, in the office or?
15 **UF1:** Yeah, if you don't mind.
16 **AG:** Yeah, yeah, no. (INDISCERNIBLE)-
17 **UM2:** (INDISCERNIBLE).
18 **UF1:** How've you been?
19 **AG:** I've been good.
20 **UF1:** Yeah?
21 **AG:** I'm trying to (INDISCERNIBLE)-
22 **UM2:** Busy as always?

1 **AG:** I am.

2 **UF1:** You always have been.

3 **AG:** All right.

4 **UF1:** But we never see you. You're like stuck in the hole down here all the time-

5 **AG:** I know. I know.

6 **UF1:** -and we (INDISCERNIBLE).

7 **AG:** I know. All right. Oh boy, okay. The office or-

8 **UF1:** Yeah.

9 **AG:** So you guys, does everybody need to be in the office?

10 **UF1:** Um-

11 **UM2:** No, where are-

12 **UF1:** -no, just-

13 **UM2:** -where's (INDISCERNIBLE)?

14 **UF1:** (INDISCERNIBLE)?

15 **AG:** Oh, just me, you and-

16 **UM2:** Yep.

17 **AG:** All right.

18 **UF1:** Hi.

19 **UF2:** Hey.

20 **AG:** All right.

21 **UF1:** Do you want um, do you want Jennifer?

22 **UM2:** Yeah.

1 **AG:** Is this something bad?

2 **UF1:** An-, Andrea. Do you want Jennifer um, ooh, it smells. Huh?

3 **AG:** I was trying to make my-

4 **UM2:** (INDISCERNIBLE)-

5 **UF1:** Dude, why does it s-

6 **AG:** I was trying to make my lunch.

7 **UF1:** Is that your lunch I smell?

8 **AG:** It is. I haven't had the time to eat 'cause I had to run (INDISCERNIBLE).

9 **UF2:** It smells amazing.

10 **AG:** I'm so sorry.

11 **UF2:** No, you're fine. Don't worry about it.

12 **AG:** All right.

13 **UF2:** I don't want to stand up.

14 **AG:** No problem.

15 **UM2:** Um-

16 **UM2:** Did you want Jen in here with you?

17 **AG:** I don't know what's going on.

18 **UM2:** So-

19 **UF2:** Just an administrative investigation is-

20 **UF1:** Starting-

21 **AG:** Oh, no, no, no.

22 **UF1:** Do you want Jennifer in here?

1 **AG:** No, no, no, no we're good.

2 **UF1:** You sure?

3 **AG:** Yeah, yeah, yeah.

4 **UF1:** Oh-

5 **UM2:** What do you need?

6 **UM2:** I'm gonna, oh who moved the van?

7 **UF1:** Oh, do you need the keys to move the van?

8 **UM2:** Oh yeah.

9 **AG:** (INDISCERNIBLE) the van. you can sit there.

10 **UM2:** I'm (INDISCERNIBLE)-

11 **AG:** I only have two chairs in here. I'm so sorry.

12 **UF1:** No, I just feel bad standing up. That's all.

13 **UM2:** So just know that if you need anything from me-

14 **UF1:** Yeah, yeah.

15 **UM2:** We normally-

16 **AG:** No, no, no, no you're fine.

17 **UM2:** -normally we, we, we give paperwork in our like recorded room. We came to you-

18 **AG:** No sir, you're good. You're good.

19 **UM2:** -to have this.

20 **UF2:** Can we close the doors so that she's got like privacy?

21 **AG:** Yeah, yeah. All right, what's going on?

22 **UF2:** Do you mind if I sit down 'cause I don't feel as-

1 **AG:** No, no, no go ahead. Go sit down.

2 **UF2:** -personable.

3 **AG:** No, no, no, no you're good.

4 **UF2:** All right. Um-

5 **UM2:** Hey first off-

6 **AG:** Yeah.

7 **UM2:** -we love you-

8 **UF2:** Yeah we do.

9 **UM2:** -and it's uncomfortable. So-

10 **AG:** All right, 'cause I, I have-

11 **UF2:** It's uncomfortable for everybody.

12 **AG:** -I don't know what I did.

13 **UM2:** So, we'll explain-

14 **AG:** I don't-

15 **UF2:** Yeah.

16 **UM2:** -and then, and then we'll let-

17 **AG:** Okay.

18 **UF2:** So-

19 **AG:** All right.

20 **UF2:** So, like I said it's an administrative investigation.

21 **AG:** Sure. No problem.

22 **UF2:** We're gonna be investigating.

1 **AG:** Sure.

2 **UF2:** You're our subject um and-

3 **AG:** Oh boy, okay.

4 **UF2:** -I'll just, I know. And I'll read this to you-

5 **AG:** I don't know-

6 **UF2:** -okay?

7 **AG:** Okay, no problem.

8 **UF2:** Um it's an administrative investigation, is being conducted into allegations or
9 miscon-, of misconduct and or operational actions in violation of city and or
10 department policy.

11 **AG:** Okay.

12 **UF2:** The allegations are described as follows. It is alleged that possible mishandling of
13 evidence and or chain of custody documentation-

14 **AG:** Okay.

15 **UF2:** -occurred involving a criminal case which was recently identified by the Maricopa
16 County Attorney's Office.

17 **AG:** Okay. I don't know-

18 **UF2:** Okay.

19 **AG:** -I couldn't even tell you what, which one-

20 **UM2:** That's okay, hey-

21 **UF2:** It's okay.

22 **AG:** -yeah.

1 **UF2:** That's what we're here for.

2 **AG:** Yeah.

3 **UM2:** -I'll, I'll s-, if it, if it's okay?

4 **UF2:** Yeah.

5 **AG:** Yeah.

6 **UM2:** We're not going to ask you any questions right now.

7 **UF2:** Not today.

8 **AG:** Okay.

9 **UM2:** So-

10 **AG:** Yeah.

11 **UM2:** -right now, just the listening part and-

12 **AG:** Yeah, yeah.

13 **UM2:** -confirming that you understand or don't understand. That-

14 **AG:** I, I do. I just-

15 **UF2:** That's it and-

16 **UM2:** -that, and that's for you.

17 **AG:** -yeah.

18 **UF2:** -this is just, right-

19 **AG:** Sure, no problem.

20 **UF2:** -so this is just the initial part of it which I'm sure-

21 **AG:** Okay.

22 **UF2:** -you're not aware 'cause you haven't been involved in any-

1 **AG:** I-

2 **UF2:** -prior.

3 **AG:** -no, not-

4 **UF2:** So-

5 **AG:** -no, just-

6 **UF2:** -this is all it is is just them notifying you that there is an investigation-

7 **AG:** Okay.

8 **UF2:** -and these are all-

9 **AG:** Who-

10 **UF2:** -the rules that you have to follow involving the investigation which I want-

11 **AG:** Okay.

12 **UF2:** -you to read carefully.

13 **AG:** Okay. Can I just read them out loud?

14 **UF2:** Huh?

15 **AG:** Do I, can I-

16 **UM2:** No, no you can read them-

17 **AG:** -read them out loud?

18 **UF2:** Whatever you want-

19 **UM2:** -to yourself.

20 **UF2:** -yeah.

21 **UM2:** Yeah, um-

22 **AG:** Oh okay. So (INDISCERNIBLE)-

1 **UM2:** -uh and you're gonna get a copy.

2 **UF2:** Yes.

3 **AG:** Oh okay.

4 **UM2:** So you don't have to memorize anything.

5 **AG:** No problem.

6 **UF2:** Yeah, if you want to-

7 **AG:** Okay.

8 **UF2:** -read it out loud, go ahead.

9 **AG:** (INDISCERNIBLE) okay. Okay.

10 **UF2:** Any questions on that?

11 **AG:** No, not on any of this. No, not at all.

12 **UF2:** Okay, I know eventually, I know you have a lot of questions but regarding-

13 **AG:** Um-

14 **UF2:** -the, the-

15 **AG:** Yeah, just like uh-

16 **UF2:** -notice, anything-

17 **AG:** -I don't even-

18 **UM2:** And, and if we have-

19 **UF2:** You're clear?

20 **UM2:** -later, later, not right now-

21 **AG:** No, yeah-

22 **UM2:** -if we have questions for you-

1 **UF2:** For you-

2 **AG:** Right.

3 **UM2:** -specifically, we'll schedule-

4 **UF2:** -we'll bring you in.

5 **UM2:** -that with you, okay?

6 **AG:** Okay, yeah. No problem.

7 **UF2:** And it's not going to be like a surprise like, so we'll-

8 **AG:** No.

9 **UF2:** -schedule it with you when it's-

10 **AG:** Perfect, yeah I just like-

11 **UF2:** -good for you. Okay?

12 **AG:** -I think that was my only one-

13 **UM2:** I know, it's, it's-

14 **AG:** -like I don't even-

15 **UM2:** -a lot. It's a lot to take in.

16 **AG:** -know. Like I wonder what-

17 **UM2:** But we'll, we'll-

18 **UF2:** Yeah.

19 **UM2:** -we care about you.

20 **UF2:** So-

21 **AG:** Yeah, no I'm just-

22 **UF2:** Yeah.

1 **AG:** -uh how have I mishandled anything-

2 **UF2:** If you could just print and sign.

3 **AG:** -but I don't know. Oh but okay, yeah, yeah sure.

4 **UF2:** Yeah, we'll delve into it later like uh Sergeant Hertenstein said-

5 **AG:** All right, no problem.

6 **UF2:** -and then-

7 **AG:** All right, so we need-

8 **UF2:** -it will probably clear more things when the time comes.

9 **AG:** Let's see, does he need my, me to print my name?

10 **UF2:** Mm hmm.

11 **AG:** All right.

12 **UF2:** Just print and sign please.

13 **AG:** Yeah, no problem.

14 **UF2:** What's today, the 15th.

15 **AG:** Today's the 15th, yep.

16 **UF2:** Mm hmm.

17 **AG:** 2026, okey-dokey.

18 **UF2:** Thanks.

19 **AG:** Yep.

20 **UF2:** And so you understand who you can and can't talk to, right?

21 **AG:** Yes, nobody.

22 **UF2:** Okay.

1 **AG:** Yeah, got it. Yeah, I've been um NOI'd before for-

2 **UM2:** As a witness or something?

3 **AG:** Um yes, and then I was a part of one, another investigation for some other stuff

4 that had happened so yeah, it's not-

5 **UF2:** Okay.

6 **UM2:** Yep, so keep it-

7 **AG:** It is what it is.

8 **UF2:** (INDISCERNIBLE)-

9 **UM2:** -keep it all to yourself.

10 **AG:** Yes sir.

11 **UF2:** This is your copy.

12 **UM2:** Keep that copy and of course we will-

13 **UF2:** All right, well cool.

14 **UM2:** -um-

15 **UF2:** I'll contact you-

16 **UM2:** -reach out to you if we have-

17 **AG:** No problem, sure.

18 **UF2:** -later-

19 **UM2:** -questions and stuff, okay?

20 **UF2:** -when everything is ready to go.

21 **AG:** All righty.

22 **UF2:** And then DC-

1 **UM3:** Yeah.

2 **AG:** Yep.

3 **UM3:** So Andrea, because of the investigation-

4 **AG:** Yeah.

5 **UM3:** -I'm here uh representing Chief Issitt-

6 **AG:** Okay.

7 **UM3:** -and because of the investigation um we're going to place you on admin leave,
8 okay? I'm gonna read-

9 **AG:** Yes sir.

10 **UM3:** -kind of the requirements of it um and-

11 **AG:** Okay.

12 **UM3:** -like, like we were all saying this is not easy um and-

13 **AG:** Yeah.

14 **UM3:** -we understand there's probably a lot of questions but-

15 **AG:** Yeah.

16 **UM3:** -uh we'll get through this, okay? So um-

17 **AG:** Okay.

18 **UM3:** -this is, this letter will serve as notice that you are being placed on administrative
19 leave effective uh Thursday, January 15th, 2026-

20 **AG:** Okay.

21 **UM3:** -pending the results of the administrative investigation uh noted uh-

22 **AG:** Yeah.

1 **UM3:** -AI2026-001.

2 **AG:** Okay.

3 **UM3:** You shall comply with the following terms and conditions during the
4 administrative leave-

5 **AG:** Okay.

6 **UM3:** -and I'll go over them each.

7 **AG:** Mm hmm.

8 **UM3:** Your immediate point of contact will be uh Jennifer Calovini.

9 **AG:** Okay.

10 **UM3:** Uh you have her number.

11 **AG:** Yes sir.

12 **UM3:** Um and we will make sure before we leave that, that you guys have each other's
13 numbers so-

14 **AG:** Yes sir.

15 **UM3:** -that you, you can uh contact her.

16 **AG:** Mm hmm.

17 **UM3:** Um, let's see. As part of this you will make sure that Jen has the best number to
18 reach you-

19 **AG:** Mm hmm.

20 **UM3:** -um and uh so that you can be reached uh during your designated work hours,
21 okay?

22 **AG:** Okay.

1 **UM3:** Uh if directed, you must respond uh to the city uh facility uh selected by the chief
2 or his designee. It will likely be uh our folks from internal affairs,-

3 **AG:** Okay.

4 **UM3:** -um within 90 minutes. Uh failure to respond without proper leave authorization
5 uh shall be cause for discipline.

6 **AG:** Sure.

7 **UM3:** Um again, you must contact uh Jennifer Calovini uh everyday at the start uh and
8 end of your work shift via text message uh and be-

9 **AG:** Okay.

10 **UM3:** -available by phone. Uh you are not required to text on designated city holidays
11 'cause I think we've got one coming up here pretty soon.

12 **AG:** We do, okay.

13 **UM3:** Yeah.

14 **AG:** Sure.

15 **UM3:** Um your designated duty uh work hours are Monday through Friday uh from
16 9a.m. to 5p.m. and you-

17 **AG:** Okay.

18 **UM3:** -like I said, you must remain available during that time uh except for those
19 holidays.

20 **AG:** Okay.

21 **UM3:** Um if you become unavailable to respond due to illness, injury uh please uh you
22 have to advise Jennifer-

1 **AG:** Sure.

2 **UM3:** -Calovini and the appropriate sick leave will be uh deducted from your uh sick
3 leave accrual.

4 **AG:** Okay.

5 **UM3:** Uh sick leave taken over three work days may require a physician's uh statement
6 certifying the reason for the sick leave.

7 **AG:** Okay.

8 **UM3:** Uh vacation leave must be scheduled with Jennifer.

9 **AG:** Okay.

10 **UM3:** Um and a minimum of 40 hou-, 48 hours of advance notice must be provided uh
11 for one to four work days before vacation leave-

12 **AG:** Okay.

13 **UM3:** -a minimum of seven days of advance notice must be provided for five or more uh
14 consecutive vacation days, okay?

15 **AG:** Okay. Mm hmm.

16 **UM3:** Um you will telephonically, either call or text uh report your hours to Jennifer
17 Calovini uh to complete your timesheet.

18 **AG:** Okay.

19 **UM3:** Uh this will occur no later than every other Thursday by 5p.m. uh at the end of the
20 pay period. Uh during a holiday-

21 **AG:** Mm hmm.

1 **UM3:** -this information must be communicated to her no later than Wednesday uh at
2 5p.m. uh before the end of that pay period.

3 **AG:** Okay.

4 **UM3:** Um you must immediately turn in all uh assigned city equipment-

5 **AG:** Okay.

6 **UM3:** -uh and we'll go over that I believe it's a work cell phone, uh any keys-

7 **AG:** Mm hmm.

8 **UM3:** -and access cards that you have.

9 **AG:** Okay.

10 **UM3:** I, I believe that's all we're, we're gonna probably gather from you today.

11 **AG:** Okay.

12 **UM3:** Um but, but I'll verify that.

13 **AG:** Okay.

14 **UM3:** Um you are prohibited from accessing uh the computer network including email,
15 software applications, files stored on city devices, which are like laptops, mobile
16 devices, etcetera.

17 **AG:** Okay.

18 **UM3:** Um and you are prohibited from entering uh the police department or any secured
19 city property while on administrative leave without prior permission of the chief or
20 the internal affairs unit and-

21 **AG:** Okay.

22 **UM3:** -you will not engage in any city business-

1 **AG:** Mm hmm.

2 **UM3:** -projects or other work or operate a city vehicle during this leave unless author-,
3 uh otherwise approved or directed by the chief or internal affairs.

4 **AG:** Okay.

5 **UM3:** Um you will be required to appear for any court dates for which you have been
6 subpoenaed and to comply with any court orders resulting from your employment
7 here at the Goodyear Police Department and you are required to provide Jennifer
8 Calovini with advance notice of any such court appearances uh for uh subpoenas
9 and or court orders.

10 **AG:** Okay.

11 **UM3:** Uh any violations of the above listed terms and conditions of the administrative
12 leave or any provision of city and or department policy and administrative
13 guidelines may subject you to discipline including termination from employment
14 with the City of Goodyear.

15 **AG:** Okay.

16 **UM3:** It's a mouthful. Uh-

17 **AG:** Yeah.

18 **UM3:** -once the investigation is complete, you will be notified of the next steps in the
19 process, okay?

20 **AG:** Okay.

21 **UM3:** So what I will do is I will go ahead and sign. Uh I will need you to sign and date.
22 We'll do two copies so that you can have one for-

1 **AG:** Sure.

2 **UM3:** -your records. We'll also have uh you know uh Sarah sign it as well as a witness,
3 okay?

4 **AG:** Sure. Okay. All right, there you go. Yep.

5 **UM3:** You guys go ahead and sign.

6 **UF2:** Mm hmm.

7 **UM3:** Here why don't you guys keep this one-

8 **AG:** Okay.

9 **UM3:** -for your files and then we'll have uh Andrea keep this one.

10 **AG:** There you go.

11 **UM3:** Thank you.

12 **UM2:** Andrea, do you have your city cell?

13 **AG:** I do, yeah.

14 **UM2:** What's the uh, thank you. What's the passcode for this?

15 **AG:** It is um 82-, gosh how many numbers is it? 820002. Come here, let me just double
16 check-

17 **UM2:** You got it?

18 **UF2:** Yeah.

19 **AG:** -it for you just to make sure that I give you the right one. Oh darn it. I believe it is
20 'cause it's the same-

21 **UM3:** Oh it used your face didn't it?

22 **AG:** Yes. It does do that now.

1 **UM2:** 82002.

2 **UF2:** No.

3 **AG:** Did it open?

4 **UM2:** What was it?

5 **UF2:** Three zeros. 82-

6 **UM2:** Oh.

7 **AG:** Three, it's three zeros-

8 **UF2:** -0002.

9 **AG:** -I believe, yeah.

10 **UM2:** 820002.

11 **UF2:** Yep. Nope.

12 **UM2:** Nope.

13 **AG:** Oh it's, it's, then maybe try four zeros. It's 820002. It should be.

14 **UM2:** No that was the right num-, right amount of-

15 **AG:** Did I give you the right one?

16 **UF2:** Mm hmm.

17 **UM2:** -of numbers.

18 **AG:** Okay.

19 **UF2:** Hmm.

20 **AG:** It's not opening?

21 **UM2:** Huh uh.

22 **AG:** Oh no.

1 **UM3:** Well here, let's do this-

2 **AG:** Okay, ready?

3 **UM3:** -while we're here.

4 **AG:** Okay.

5 **UM3:** We'll you've, you're, you're always

6 **AG:** Oh-

7 **UM3:** -gonna open it because it's face I.D.-

8 **AG:** -oh darn it. Oh okay.

9 **UM3:** -uh can we disable-

10 **AG:** But what if I do this?

11 **UM3:** -the locking feature? Would that be okay?

12 **AG:** Can I just put it down and-

13 **UM2:** Yeah.

14 **AG:** -not (INDISCERNIBLE)-

15 **UM2:** yeah, un-, you can-

16 **UF2:** Okay, now try it.

17 **UM2:** -un-, oh go ahead-

18 **AG:** You ready?

19 **UM2:** -try it-

20 **UM2:** -try, try it now.

21 **AG:** It's 820002. No?

22 **UM2:** That's okay, use your face.

1 **AG:** Oh I know what it is. I know what it is. 820272. That's what it is. I'm so sorry.

2 **UM2:** 820272.

3 **UM2:** No, I forget mine too because I use it-

4 **AG:** No, 820072.

5 **UM2:** All right. All right.

6 **UF2:** Oh shoot, 820072-

7 **AG:** Too many numbers. Yes, the-

8 **UF2:** I wrote what you said-

9 **AG:** -the 72 is the last, the numbers.

10 **UF2:** Try again. 82-

11 **UM2:** Do, do it again.

12 **UF2:** -00-

13 **UM2:** 02-, 820272.

14 **UF2:** 272.

15 **UM2:** Got it.

16 **UM2:** Six digits.

17 **AG:** Did you get it?

18 **UF2:** Is that what you did, 272 not 0072?

19 **UM2:** Yep.

20 **UM2:** Yeah, it's-

21 **UM2:** And then your um, yep thank you.

22 **UF2:** And hard keys.

1 **AG:** Oh, my hard key is in my pocket.

2 **UM2:** If you have the hard keys, yep.

3 **AG:** I do have the hard keys right here.

4 **UM2:** Okay, is that all of, the, the extent?

5 **AG:** That's all the keys.

6 **UM2:** Okay.

7 **AG:** It's, yeah it's the only set of keys that we all have. That's it, yeah.

8 **UF2:** That's it?

9 **UM2:** Okay.

10 **UF2:** Okay. Anything, any other property? You good?

11 **UM2:** Okay.

12 **AG:** I don't have anything else.

13 **UM2:** You don't have a laptop or anything at home?

14 **AG:** I don't have a laptop. No, I do not-

15 **UM2:** Okay. Um-

16 **AG:** -or (INDISCERNIBLE) or anything like that.

17 **UM2:** -you don't have a city vehicle. I'm just-

18 **AG:** I do not.

19 **UM2:** -trying to kind of go over-

20 **UF2:** Yeah.

21 **AG:** No, I don't.

1 **UM2:** Um and really the main point of all of this is to obviously conduct the
2 investigation.

3 **AG:** Sure.

4 **UM2:** Uh if you have any questions-

5 **AG:** Sure.

6 **UM2:** -not about the investigation but like work stuff, you know, that you need to talk to,
7 you gotta go through Jen for everything so um she'll be your-

8 **AG:** Yeah, yeah, sure. No problem.

9 **UM2:** -point of contact.

10 **UM3:** There's a misconception.

11 **AG:** All right.

12 **UM3:** This, this means there's an investigation.

13 **AG:** Sure, uh you know what, you have to do what you have to do. I don't, like you
14 said when you had come in you had mentioned something-

15 **UF2:** Mm hmm.

16 **AG:** -about Maricopa County, I don't, I don't, I have no idea and I'd, I'd have to jar-

17 **UM2:** Well we'll-

18 **AG:** -my memory here for-

19 **UM2:** -well, it's okay. We'll, we'll-

20 **AG:** -something but no-

21 **UF2:** And then yeah, we'll bring you in like we said-

22 **AG:** -um-

1 **UF2:** -for the details-

2 **AG:** Yeah, no problem. I mean uh I-

3 **UF2:** -and you'll have your chance to gather.

4 **UM3:** We'll, we'll work through it and we're-

5 **UF2:** Yeah.

6 **UM3:** -we're, we're not against you.

7 **AG:** Yeah, no problem. I mean uh-

8 **UM3:** We're with you, okay?

9 **AG:** Okay, so this was a, just in a nutshell, so what you had um discussed with me

10 earlier was some mishandling of something of some sort?

11 **UF2:** Yeah, you have it right over there.

12 **UM2:** Yep.

13 **UF2:** It's, it's got the uh-

14 **UM2:** Yep, top of your paper.

15 **UM2:** Top of your folder.

16 **AG:** Oh I'm so sorry.

17 **UF2:** Yeah.

18 **UM2:** Yep, so these, these two are yours.

19 **AG:** Yes, okay. I'm so sorry.

20 **UF2:** Let me sign that too just 'cause it's not an actual-

21 **AG:** This one here?

22 **UM2:** Is there anything-

1 **UF2:** -copy of our-

2 **AG:** I'm sorry.

3 **UM2:** -in here, is there anything in here-

4 **UF2:** -signatures.

5 **UM2:** -'cause you won't have access, that you need to take with you today?

6 **AG:** Um no, uh just my binder and my pack. I usually carry everything in there. Um I

7 don't need, I have, my earbuds can stay here um and my lunch bag. Everything

8 else-

9 **UM2:** Everything else can wait.

10 **AG:** -no, I don't. Everything else is um-

11 **UM2:** Okay.

12 **AG:** Yeah.

13 **UM2:** I just want to make sure you don't leave with something really personal here that

14 you need-

15 **UF2:** Yeah.

16 **AG:** No, no, no-

17 **UM2:** -to take with you.

18 **AG:** -not at all.

19 **UM2:** Medications, anything like that?

20 **AG:** Uh no, I keep any of my vitamins and things in my pack. Those

21 (INDISCERNIBLE) with yeah.

1 **UM2:** And, and the reality if you go home and you're like oh man I forgot, I did have
2 this there-

3 **UF2:** Yeah.

4 **UM2:** -just again work through Jen-

5 **AG:** Yeah, sure. No problem.

6 **UM2:** -or, or internal affairs. They'll, they'll also-

7 **UM3:** Mm hmm.

8 **UF2:** Yep.

9 **UM2:** -kind of help liaison for that.

10 **UM3:** Absolutely.

11 **UF2:** Yeah, definitely.

12 **AG:** It's uh 1:15, 2026. That's yours?

13 **UF2:** Yeah, so hold onto that-

14 **AG:** Oh, okay.

15 **UF2:** -so you know-

16 **AG:** Sure.

17 **UF2:** -and you can remember what it's about and all of that. I think that one was mine.

18 **UM3:** Nope.

19 **UF2:** Oh okay.

20 **AG:** Okay, I, so do you need to escort me out?

21 [END OF AUDIO]

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CERTIFICATE

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I, STEPHANIE L. CONTOS, Transcriptionist, do hereby certify that the foregoing pages 1-28 constitute a full, true, and accurate transcript from an electronic recording of the proceedings had in the foregoing matter, all done to the best of my skill and ability.

Signed and dated this 9th day of March, 2026

(s) STEPHANIE L. CONTOS