

STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO,

Plaintiff,

vs.

ALEXANDER RAE BALDWIN III  
HANNAH GUTIERREZ  
DAVID HALLS

No. D-0101-CR-202300039  
D-0101-CR-202300040  
D-0101-CR-202300041  
Judge Mary Marlowe Sommer

Defendants

**STATE'S NOTICE OF INTENT TO CALL EXPERT  
WITNESSES/SUBJECT AREA OF TESTIMONY**

COMES NOW the State of New Mexico, by and through its District Attorney, Mary Carmack-Altwies, and gives notice to the Defendants that it intends to call the following witnesses as experts together with providing the subject area in which the below designated experts will testify:

1. Bryan W. Carpenter, Dark Thirty Film Services, 13 South Productions and Sphere

Expert in the Areas of: Training of Actors/Stunt Performers/Crew Members in the proper use of firearms and weapons on set. Security and organization protocols in regards to the presence/operation/application of all weapons on a film/television production. Cross-Platform safety/custom/standards in regard to firearms. The Duties/Responsibilities of actors along with all personnel associated with the production of a film and/or television project. Roles of a Film Producer. Union Guidelines and Safety Protocol.

Lena, Mississippi

2. Robert W. Gillette, Federal Bureau of Investigation/Laboratory Division  
Explosives Unit

Subject Areas of Testimony: Expert in the Area of forensic  
examination of explosives

Redstone Arsenal, Alabama

3. Jerrilyn M. Conway, DNA Casework Unit, Federal Bureau of  
Investigation Laboratory

Subject Area of Testimony: Expert in the area of Serological and  
Nuclear DNA analysis and examinations.

FBI Laboratory, Quantico, Virginia

4. Shannon E. Prince, Physical Scientist/Forensic Examiner, FBI  
Laboratory, Latent Print Operations Unit

Subject Areas of Testimony: Expert in the areas of examination of  
latent prints.

FBI Laboratory, Quantico, Virginia

5. Bryce A. Ziegler, Federal Bureau of Investigation Laboratory Division,  
Firearms/ Toolmarks Unit

Subject Areas of Testimony: Expert in the area of forensic  
examination of firearms and tool marks.

FBI Laboratory, Quantico, Virginia

6. Brianna L. Peterson, Ph.D., F-ABFT  
Forensic Toxicologist

Subject Area of Testimony: Expert in toxicology

c/o Office of NMS Labs, Horsham, PA.

7. Heather Jarrell, MD OMI

Chief Medical Examiner OMI

Subject Area of Testimony: Expert in toxicology, expert  
in toxicology in the field, Forensic Neuropathology  
Office of the Medical Examiner

Albuquerque, New Mexico

8. Brianna Peterson, PhD, F-ABFT  
Toxicologist II

Area of Testimony: Clinical and forensic toxicology analysis  
NMS Labs

Horsham, Pennsylvania

9. Lee Stewart Anderson, Jr. MD  
Emergency Medicine

Area of Testimony: Treatment of patients in emergency  
situations

Christus St. Vincent Regional Medical Center, Santa Fe, NM

10. Lucien "Luke" Haag

Area of Testimony: Expert in the field of criminalistics; reconstruction  
of shooting scenes and incidents; forensic firearms, tool mark, and  
ballistic examination; terminal ballistic properties, including effects and  
behavior of projectiles; and chemistry, including firearm/ballistic-related  
chemistry.

Carefree, Arizona

/s/ Kari T. Morrissey

Prosecutor(s)

First Judicial District Attorney's Office

Kari T. Morrissey

(ktm@morrisseylewis.com)

Jason J. Lewis (jil@jllaw.com)

1303 Rio Grande NW, Suite 5

Albuquerque, New Mexico 87104

(505) 361-2138

(505) 573-2784

#### CERTIFICATE OF DELIVERY

I hereby certify that I caused to be delivered, by and through the electronic services through Odyssey, a true and correct copy of the foregoing pleading to defense counsel, Heather LeBlanc, Luke Nikas, Alex Spiro, Jason Bowles, Todd Bullion, and Lisa Torracco, on this 6<sup>th</sup> day of April 2023.

/s/ Kari T. Morrissey

Special Prosecutor