

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)

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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 6th day of April 2023.

/s/ Kari T. Morrissey

Special Prosecutor