

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO,

Plaintiff,

v.

D-101-CR-2023-00040

HANNAH GUTIERREZ-REED,

Defendant.

DEFENDANT'S WITNESS LIST AND EXPERT WITNESS LIST

Defendant Hannah Gutierrez-Reed, by and through her counsel of record, Jason Bowles of Bowles Law Firm, and Todd J. Bullion of Bullion Law Office, hereby submits her list of witnesses she may call at trial:

1. Thell Reed
c/o Bowles Law Firm
4811 Hardware Drive, N.E., Suite D-5
Albuquerque, N.M. 87109
Telephone: (505) 217-2680
Email: jason@bowles-lawfirm.com
2. Daniel Ornitz
Email: ornitzdaniel@gmail.com
Telephone: (314) 602-0892
3. Officer Troy Teske
3036 Hickory St.
Bullhead City, AZ 86429
Telephone: (928) 323-4045
4. Nicole Montoya

5. Gabrielle Pickle
c/o Mr. J. Scott Humphrey
J. Scott Humphrey, P.C.
1158 26th Street, #560
Santa Monica, California 90403
scott@humphreylaw.com

6. Sarah Zachary
7523 Rio Salada Court NW
Albuquerque, NM 87120

c/o D. Chet Alderete
Spirit A. Gaines
Drew A. Larkin
Riley, Keller, Alderete, Gonzales
3880 Osuna Road, NE
Albuquerque, N.M. 87109
calderete@rileynmlaw.com
sgaines@rileynmlaw.com
dlarkin@rileynmlaw.com

7. Seth Kenney
PDQ Arm and Prop,
126 Monroe Street, Albuquerque, NM 87108

8. David Halls
Email: davehalls.ad@gmail.com
Telephone: (612) 414-6056

9. Robert Genoway
State of New Mexico - Environment Department
Occupational Health and Safety Bureau
525 Camino de los Marquez, Suite 3
Santa Fe NM 87505
Telephone: (505) 476-8700

10. Any witness called by the State of New Mexico.

11. Any rebuttal witnesses.

EXPERT WITNESSES:

12. Frank Louis Blair Koucky III
Telephone: (831) 917-6555

Mr. Koucky is an expert in firearms, firearms safety and handling, reloading of ammunition, and identification of ammunition.

13. Scott Elliott
Owner/Private Investigator
3C Options
PO Box 11626
Albuquerque, NM 87192
Telephone: (505) 720-5863

Mr. Elliott is an expert in investigations, quality of investigations, best investigative practices in homicide and manslaughter cases.

15. Any rebuttal expert witnesses.
16. Any expert witness called by the State.

Respectfully submitted,

/s/ Jason Bowles

Jason Bowles
Bowles Law Firm
4811 Hardware Drive, N.E., Bldg D, Suite 5
Albuquerque, N.M. 87109
Telephone: (505) 217-2680
Email: jason@bowles-lawfirm.com

-and-

Todd J. Bullion
4811 Hardware Drive, N.E., Bldg D, Suite 5
Albuquerque, N.M. 87109
Telephone: (505) 494-4656

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was sent through the ESF system, which caused the following parties to be served by electronic means, as reflected on the Notice of Electronic Filing this 23rd day of August, 2023, to the counsel listed below:

Kari Morrisey, Special Prosecutors
Jason Lewis, Special Prosecutors

/s/ Jason Bowles
Jason Bowles
Bowles Law Firm