

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO,

Plaintiff,

vs.

HANNAH GUTIERREZ

Defendant

D-0101-CR-202300040
Judge Mary Marlowe Sommer

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

COMES NOW the State of New Mexico, by and through its Special Prosecutors, 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. 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

7. 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

8. Jason Hawks

Area of Testimony: Expert in the field of analysis and testimony with regard to carrier records, device forensics and extractions, GPS data, social media returns, analysis of phone records, and other data streams.

La Quinta, California

/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, Jason Bowles and Todd Bullion on this 11th day of July 2023.

/s/ Kari T. Morrissey
Special Prosecutor