

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.


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**DEFENDANT'S FIRST WITNESS LIST AND EXPERT WITNESS LIST FOR TRIAL**

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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](mailto:jason@bowles-lawfirm.com)
2. Daniel Ornitz  
Email: [ornitzdaniel@gmail.com](mailto: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  
Email: [scott@humphreylaw.com](mailto: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  
Email: [calderete@rileynmlaw.com](mailto:calderete@rileynmlaw.com)  
[sgaines@rileynmlaw.com](mailto:sgaines@rileynmlaw.com)  
[dlarkin@rileynmlaw.com](mailto:dlarkin@rileynmlaw.com)
  
7. Seth Kenney  
PDQ Arm and Prop  
126 Monroe Street  
Albuquerque, NM 87108
  
8. David Halls  

  
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. Daniel Joseph Trujillo  
2425 N. Gonzales Street  
Las Vegas, New Mexico 87701-4133  
Email: [Guitarist8999@gmail.com](mailto:Guitarist8999@gmail.com)
  
11. Colin Floom  
Telephone: (720) 601-8202

12. Reid Russell  
22933 Leonora Drive  
Woodland Hills, CA. 91367
13. Mamie Mitchell  
c/o Gloria Allred  
Allred, Maroko & Goldberg  
6300 Wilshire Blvd., Suite 1500  
Los Angeles, CA 90048  
Telephone: (323) 653-6530  
Email: [gallred@amglaw.com](mailto:gallred@amglaw.com)
14. John Ziello  
15366 Atkinsons Ave.  
Gardena, CA 90249
15. Ross Addiego  
c/o Vigil Law Firm, P.A.  
Jacob G. Vigil, Esq.  
2014 Central Ave. SW  
Albuquerque, New Mexico 87104
16. Karen Kuehn  
6 Frontier Court  
Peralta, New Mexico 87042
17. Joel Souza  
2869 Chamier Place  
Fremont, CA 94555
18. Cherilyn Schaefer  
325 Morrison Drive  
Bosque Farms, NM 87068
19. Serge Svetnoy  
c/o Gary A. Dordick, Esq  
Dorick Law Corporation
20. Any witness listed on a witness list by the State of New Mexico.
21. Any witness called by the State of New Mexico.
22. Any rebuttal witnesses.

**EXPERT WITNESSES:**

23. Frank Louis Blair Koucky III  
c/o 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](mailto:jason@bowles-lawfirm.com)

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

24. 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.

25. P.J. Pesce  
c/o 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](mailto:jason@bowles-lawfirm.com)

Mr. Pesce is an expert witness on movie set safety, chain of command and protocols on movie set, roles of various persons on movie sets, and role of an armorer on movie sets.

26. James Hannah  
123 N. 9<sup>th</sup> St. STE C  
Las Vegas, NV 89101  
Telephone: (702) 326-6251  
Email: [lasvegaspolygraph@gmail.com](mailto:lasvegaspolygraph@gmail.com)

Mr. Hannah is a qualified polygraph examiner who will testify to the test results of Ms. Gutierrez-Reed's polygraph examination.

27. Any rebuttal expert witnesses.
28. Any witness needed for authentication or chain of custody.
29. Any expert witness called by the State.

Respectfully submitted,

/s/ Jason Bowles

Jason Bowles

Bowles Law Firm

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-and-

Todd J. Bullion

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**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 3<sup>rd</sup> day of January, 2024, to the counsel listed below:

Kari Morrisey, Special Prosecutors

Jason Lewis, Special Prosecutors

/s/ Jason Bowles

Jason Bowles

Bowles Law Firm