

STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO,

v.

D-10 1-CR-2024-13

ALEXANDER RAE BALDWIN,  
Defendant.

**SECOND AMENDED DEFENDANT'S WITNESS AND EXPERT WITNESS LIST**

Defendant Alexander Rae Baldwin, by and through his counsel of record, Luke Nikas and Alex Spiro of Quinn Emanuel Urquhart & Sullivan, LLP, hereby submits his list of witnesses he may call at trial:

1. David Halls, c/o Lisa Torracco  
Email: lisatorracco@gmail.com  
Telephone: 505-244-0530
2. Robert Shilling  
327 Sandoval St. Santa Fe, NM 87501
3. S.A. Jose Cortez  
jacortez@fbi.gov
4. Deputy Sheriff Steven Orr  
35 Camino Justicia, Santa Fe, NM 87508
5. Det. Joel Cano  
35 Camino Justicia, Santa Fe, NM 87508
6. Det. Roy Arndt-Trujillo  
35 Camino Justicia, Santa Fe, NM 87508
7. Lt. Michael Martinez  
35 Camino Justicia, Santa Fe, NM 87508
8. Sgt. Christopher Zook  
35 Camino Justicia, Santa Fe, NM 87508

9. Cpl. Oliver MacCartney  
35 Camino Justicia, Santa Fe, NM 87508
10. Cpl. Ernest Alderete  
35 Camino Justicia, Santa Fe, NM 87508
11. Major Gabriel Gonzales  
35 Camino Justicia, Santa Fe, NM 87508
12. Undersheriff Ken Johnson  
35 Camino Justicia, Santa Fe, NM 87508
13. Sheriff Adan Mendoza  
35 Camino Justicia, Santa Fe, NM 87508
14. Jonathan Jaramillo  
35 Camino Justicia, Santa Fe, NM 87508
15. Hannah Gutierrez  
c/o Bowles Law Firm  
4811 Hardware Dr., N.E., Bldg. D, Suite 5  
Albuquerque, NM 87192
16. John Ziello  
15366 Atkinsons Ave.  
Gardena, CA 90249
17. Karen Keuhn  
6 Frontier Court  
Peralta, New Mexico 87042
18. Catherine Walters  
c/o J. Scott Humphrey  
1158 26th St., #560  
Santa Monica, CA 90403
19. Doran Curtin  
247 Casados St. SE  
Santa Fe, NM 87501
20. Reid Russell  
22933 Leonora Dr,  
Woodland Hills, CA 91367
21. Zachariah Sneesby  
25 Yerba Buena,

Cerrillos, NM 87010

22. Thomas E. Gandy  
1 Wais Ct,  
Las Lunas, NM 87031
23. Brian Bolman  
819 Marquez Ln Sw,  
Albuquerque, NM 87102
24. Lucas Hussack  
1208 La Vega Drive South,  
Albuquerque, NM 87105-3949
25. Elizabeth Small  
eksmall@fbi.gov
26. Andrew Knight (records custodian)  
New Mexico Environment Department  
Office of General Counsel  
Andrew.knight@env.nm.gov

The defense reserves the right to call any witness listed on any State's witness list, any witness called by the state, any rebuttal witness, and any witness needed for authentication or chain of custody, and further reserves the right to supplement or amend this list, including based on newly discovered or disclosed evidence.

Respectfully submitted,

QUINN, EMANUEL, URQUHART & SULLIVAN

By: /s/ Luke Nikas

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Alex Spiro (*admitted pro hac vice*)

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LEBLANC LAW, LLC

By: /s/ Heather M. LeBlanc

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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 6, 2024, I electronically filed the foregoing with the Clerk of the Court using the Court's electronic filing system, which caused all participants and counsel of record to be served, as more fully reflected on the Notice of Electronic Filing.

/s/ Heather M LeBlanc  
Heather M. LeBlanc  
Counsel for Defendant