

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA, IN AND FOR THE COUNTY OF PASCO

STATE OF FLORIDA,  
Plaintiff,  
vs.  
ADAM MATOS,  
Defendant.

CASE NUMBER(S)  
2014-CF-005586CFAXWS

Paula S. O'Neil  
Clerk & Comptroller  
Pasco County, Florida

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PROCEEDINGS: Deposition of Anna Marie Cox  
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New Port Richey, FL 34654  
REPORTED BY: Karla Josephik  
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ORIGINAL

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WITNESS:

PAGE NO.

Anna Marie Cox

Direct Examination  
By Mr. Michailos

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Certificate of Oath

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THEREUPON,

ANNA MARIE COX

having been first duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. MICHAÏLOS:

Q Please state your full name for the record.

A Anna Marie Cox.

Q My name is Nick Michailos. I'm an attorney with the Public Defender's Office and my office has been appointed to represent Adam Matos. And you have been recently listed as an expert witness by the State Attorney and you had an opportunity to put together a report, correct?

A Yes.

Q And I did review your CV, not too closely, but your specialty is what?

A Blood stain pattern analysis, chemical enhancement and proper homicide processing techniques.

Q Okay. You have a Bachelors of Science, right?

A Correct.

Q Do you have other college degrees as well, graduate degrees?

A Yes.

Q So, when you say graduate certificate and

1 forensic death investigation, that's a college graduate  
2 degree?

3 A That is a certificate, graduate certificate and,  
4 then, I also have a Master's Degree in Forensic Science.

5 Q I see that, cool. That was in San Diego,  
6 National University?

7 A Yes.

8 Q Were you involved -- employed in law enforcement  
9 before you went to college?

10 A Before I went to college, which college? No,  
11 the answer to that either way would be no.

12 Q You never were an employee of --

13 A I worked for the Pinellas County Sheriff's  
14 Office for 13 years as a Crime Scene Investigator but that  
15 is not a sworn position.

16 Q Was that after getting your Bachelor's of  
17 Science or before?

18 A That was after my Bachelor of Science before the  
19 Associate's.

20 Q And before the Master's?

21 A Before the Master's and the graduate certificate  
22 so the Bachelor's is the only thing I had prior to law  
23 enforcement.

24 Q I'm assuming you've testified in criminal cases  
25 before?

1 A Yes.

2 Q Several times?

3 A Yes.

4 Q Over 100?

5 A Well, if you're talking about bloodstain pattern  
6 analysis not over 100. But if you're taking total  
7 totality in the 17 years to include depositions, I would  
8 say that's close.

9 Q How about in-court testimony, about half that,  
10 about 50?

11 A Well, I couldn't approximate that. The only  
12 thing I can give you is with my CV I gave the amount of  
13 times that I've testified for bloodstain as well which is  
14 13. And then as a Pinellas County employee and then these  
15 are as my private.

16 Q Okay. Are those at the end?

17 A Correct, so that would be 13 plus so 27.

18 Q That's cases you've worked on?

19 A No, that's 27 times I've testified regarding  
20 just bloodstain analysis or proper crime scene processing  
21 techniques. When I was at the Pinellas County Sheriff's  
22 Office, I also testified in burglaries, assaults, stolen  
23 vehicles, basically any criminal case that I worked if I  
24 had been called to testify, other deposition or court and  
25 grand jury.

1 Q Right now you are privately employed, your own  
2 business?

3 A Yes.

4 Q So, you're not affiliated with any law  
5 enforcement agency at this time?

6 A I am not.

7 Q Is it fair to say that when you have testified  
8 it has been on behalf of the State?

9 A And the Defense.

10 Q Okay. So, of the cases that you pointed to that  
11 you've testified on, do you know the percentage of those  
12 that you testified for Defense?

13 A I do. All the testimony that I did at the  
14 sheriff's office was for the State. For the Defense would  
15 be Monroe County, Florida, that's down in the Keys, that's  
16 the Defendant was Todd Helfritch. I also testified for  
17 the Defense for Montgomery County, Maryland, that's the  
18 Rahul Gupta case in March 2015. And then the Defendant,  
19 last name was Garland, and that was in Citrus County in  
20 May of 2017.

21 Q Great. Now, I was given a copy of the report  
22 that you did and it's 17 pages including your glossary at  
23 the end?

24 A Yes.

25 Q I think we discussed it off the record but is it

1 true that you had never been to the actual house where the  
2 alleged crimes took place?

3 A That's correct.

4 Q So, in your report you do chronologize the  
5 references that you use to come to your conclusions,  
6 included in that is the photographs obviously, several  
7 photographs, I assume, right?

8 A Yes.

9 Q And police reports, autopsy reports, and things  
10 of that nature, right?

11 A Yes.

12 Q But is it fair to say most of your opinions the  
13 sources that contribute to most of your opinions would be  
14 the photographs; is that fair?

15 A The photographs, the autopsy reports, and the  
16 technician, the crime scene technician reports.

17 Q Okay. Do you have any idea how many photos  
18 other than the ones you've given me on disk that you took  
19 yourself? Do you know how many of the Pasco County  
20 Sheriff's Office photos you've reviewed regarding your  
21 findings in this case?

22 A Oh, my goodness, a thousand, there was a lot.

23 Q Okay. Let me start off with some simple  
24 questions. In different locations of your report you use  
25 the word luminescence.



1 A Yes.

2 Q Explain to me what that means.

3 A Luminescence is a phenomenon that occurs when  
4 you apply a heme-based chemical to blood. It actually  
5 glows and that's based off of something called an  
6 oxidation peroxidase activity and the actual glowing is  
7 the production of heat and that is what you're actually  
8 seeing. So, it's a chemical that causes blood to glow.

9 Q Heat emitted because of oxidation?

10 A Correct.

11 Q And you're looking for signs -- you actually  
12 notice signs of this luminescence in the photographs that  
13 you observed, right?

14 A Yes.

15 Q So, obviously, those photographs were taken when  
16 this oxidation was taking place?

17 A Correct.

18 Q When the luminescence takes place is it seen  
19 only with the use of a special light, like a black light  
20 bulb or something? Or is it just in normal lighting you  
21 can see the luminescence?

22 A This particular chemical you can see it without  
23 the enhancement of alternate light source. There are  
24 other chemicals that require that but they did not use  
25 that in this situation.

1 Q Do you know what chemical they used in this  
2 situation?

3 A They used a Luminol derivative called Bluestar.

4 Q It's your understanding they used Bluestar?

5 A Correct.

6 Q What are some other examples?

7 A You can use a chemical called Just Luminol. You  
8 can use something called Flourescein. You can use  
9 something called Hemascein and those are the ones once  
10 that I'm most familiar with.

11 Q This one was Bluestar?

12 A This was Bluestar. So it's a Luminol derivative  
13 which basically means it's a Luminol base but then they  
14 increase the Ph to make the luminescence more vibrant for  
15 photography.

16 Q Okay. Because reviewing the reports for  
17 whatever reason I remember seeing the term Luminol. I  
18 don't recall the Bluestar being mentioned in the forensic  
19 reports; was it there?

20 A I believe I was told they used Bluestar; if I  
21 recall correctly at the evidence review.

22 Q But Bluestar is sort of higher grade Luminol, if  
23 you will?

24 A It's a derivative of a Luminol. I wouldn't say  
25 it's a higher grade. They just hadn't manipulated the Ph

1 because Luminol can be difficult to photograph in certain  
2 conditions. So, when you increase the Ph, it increases  
3 the heat that is being released and makes it easier to  
4 document.

5 Q This luminescence is just an indicator that  
6 there's blood there?

7 A Indication that there's indicative of the  
8 presence of blood and its claim to fame is that it can  
9 help you find blood that is not visible to the naked eye  
10 either being too faint or it's been altered or cleaned up.

11 Q And it could be animal blood, it doesn't  
12 necessarily have to be human blood?

13 A Correct.

14 Q It's not 100 percent, there could be false  
15 positives?

16 A Absolutely could be false positives.

17 Q In the master bedroom there's some photographs  
18 that show a corner bead that looks like it's been  
19 penetrated by a projectile like a bullet; did you review  
20 that photograph?

21 A I saw that photograph, yes.

22 Q My understanding is you drew no conclusion --  
23 that's outside your specialty? You had nothing to do --  
24 you didn't use that bullet to come to any conclusions?

25 A No, I did not use the trajectory at all.

1 Q Okay. In the stairwell, obviously, there's  
2 mention of blood.

3 A Page four.

4 Q I think so. There you go, thank you.  
5 Underneath description of the bloodstains in the stairwell  
6 you notate a transfer stain with sufficient blood volume  
7 to cause pooling at the bottom of the stain. With regard  
8 to that pooling or that stain, do you know whose blood  
9 that matched, whose DNA that matched in the stairwell?

10 A I don't recall that being tested.

11 Q Okay.

12 A It's the landing, it's the landing, like when  
13 you come down from the dining room and then you have that  
14 landing and it turns, that's the area I'm talking about.  
15 I'm not trying not to get things out of order. If these  
16 are in order, I'm usually terrible about that. You can  
17 barely see it in this photograph, it's right there. This  
18 is a photograph without scale. It's basically a stain and  
19 then, at the bottom, it's got a heavier deposition of the  
20 blood which means there was sufficient blood volume that  
21 the gravity was able to basically break surface tension  
22 and start to pull it away.

23 Q And just for clarification, it looks like it's  
24 the front part of the step?

25 A Correct, I think I refer to it as the front lip.

1 Q Okay, that's what you mean by that, okay.

2 A Transfer stain, front edge of the middle landing  
3 area of the steps.

4 Q So, could that have been from a drop of blood?

5 A Could have been. Actually, I called it a  
6 transfer, so, no.

7 Q You don't believe so?

8 A No, I believe it's indicative more of a  
9 transfer, something that had sufficient blood volume in  
10 that area came in contact with the step and the blood was  
11 gathered, there was a transfer as opposed to what I would  
12 consider to be a passive drip because visually it would  
13 have looked different if it had been a drip downward so,  
14 no, it's a drip.

15 Q So, it could have been from a shoe, for  
16 instance, possibly?

17 A If the shoe had enough blood volume on the  
18 bottom of it. Anything that had blood on it could have  
19 caused that.

20 Q You made reference in that part of the report  
21 regarding a door eyelet, like a lock eyelet or hook.

22 A Yes. Those pictures are in there, I saw them.  
23 This would be -- this is the hook portion. This is the  
24 bottom of the stairwell. This would be what I consider to  
25 be the locking hook apparatus and then the little eyelet,

1 there's a close-up of the hook. And then the little  
2 eyelet would be on the door so, when you close the door,  
3 you would latch the hook through the little eyelet.

4 Q Okay. So, this is obviously from the staircase  
5 going down?

6 A Yes.

7 Q And on the other side of that door is a hallway  
8 that leads to the garage?

9 A It's like room K I think they identified it as.  
10 It's the layout of the bottom was kind of difficult to  
11 orient yourself at first but there's a room that appears  
12 like a large room at the north end leads into that and  
13 then the stairwell leads into it and then the west garage  
14 leads into it so that's room K.

15 Q But that eyelet, clearly that lock, it's like a  
16 latch is from the inside of the house to lock it from the  
17 inside obviously to keep out intruders, right?

18 A It's on the inside of the door. I can't say  
19 what the purpose is.

20 Q Okay. But you've never been to the house? You  
21 haven't been to the house?

22 A I have not.

23 Q On page five in the middle in your report you  
24 you're referencing observations in the photographs taken  
25 of the inside of the west garage, correct?

1 A Yes.

2 Q You talk about certain flaps of a box, right?

3 A Yes.

4 Q That have some stains on top of the box?

5 A It's two boxes that are -- they're stacked but  
6 they're not symmetrically stacked, they're just kind of  
7 put one on top of the other and there's bloodstains that  
8 are present on various areas of each box.

9 Q Would you happen to have those in the  
10 photographs you took?

11 A No. Oh, you know what, I have the boxes but  
12 they were dismantled for packaging purposes but I did take  
13 some photographs of the stains.

14 Q Then I better look at his.

15 A There they are.

16 Q Is that the boxes?

17 A Yep, these are the boxes.

18 Q In the west garage?

19 A Correct. So, this is the vehicle right here,  
20 this is the vehicle. That's the refrigerator. That is  
21 behind the refrigerator this way is the hallway that leads  
22 to room K.

23 Q And the east and west garage, they're not  
24 connected directly, they're directly with a hallway  
25 behind?

1 A Well, it's a little small hallway that comes off  
2 of the west garage and then it -- at the hallway you can  
3 go straight into room K or hang a right and go into the  
4 east garage.

5 Q But you can't go from east to west garage  
6 without leaving the garage to go into one of these  
7 hallways, right?

8 A You would go into the west garage hallway and  
9 turn right or you'd have to go through the bay door, out  
10 the bay doors, and go in the east bay door.

11 Q Right, right, okay.

12 A So, they're haphazardly stacked and there were  
13 bloodstains on the flaps of these that formed specific  
14 patterns.

15 Q Do you see the stains in this photograph?

16 A Yes. So, for example, you can't see the stains  
17 in this photograph up here because it's bent but those are  
18 the stains that were referenced and those scales were  
19 placed by the technician that worked this particular  
20 garage.

21 Q Just for clarity purposes, this is a cardboard  
22 box that's labeled Megan and [REDACTED] in black ink, black  
23 magic marker?

24 A Here's a close-up of them.

25 Q Your opinion is that those are cast-off stains,



1 right?

2 A Yes.

3 Q That's because there seems to be a linear  
4 direction to them?

5 A When I identify stains I have to look at several  
6 things. I look at their size, their shape, their overall  
7 distribution and their relationship to each other and  
8 that's when you -- and, of course, you have to look at the  
9 surface and all of that as well. But, once you start to  
10 look at all of those features, there becomes some very  
11 visible overall patterns that are very distinct from  
12 others so this would be distinct of a cast-off pattern as  
13 opposed to a passive drip stain.

14 Q Cast-off is blood coming off an item like a  
15 knife or other object, right?

16 A Yes, it is blood being flung off of an item.

17 Q Do you know whose blood that is? Whose DNA was  
18 on that box?

19 A Yes. My understanding is I don't know if C.C --  
20 but I know the blood on the box among one of the patterns  
21 did come back to Nicholas Leonard.

22 Q Okay.

23 A And here's more patterns on the boxes. This is  
24 a completely different cast-off pattern so there's two  
25 cast-off patterns on this box.

1 Q In this picture it looks like there's more than  
2 just blood, right? Bodily tissue, is that what that is,  
3 or just dried up blood?

4 A Because of the state of possible decomposition  
5 and decay of the blood I wasn't able to identify, you kind  
6 of have to have a microscope in order to do that, so, it  
7 could be coagulated blood, it could be decomposed blood,  
8 or it could be tissue.

9 Q Okay. Now, there's a mention that there was a  
10 mattress found in one of the garages, the west garage,  
11 right?

12 A Yes.

13 Q Was that a whole mattress?

14 A Yes.

15 Q Then there's a --

16 A Let me rephrase that. It was a whole mattress  
17 with the foam top removed.

18 Q Like a pillow top removed?

19 A Yeah, like a cushiony soft pillow top had been  
20 cut off the mattress.

21 Q And that pillow top was discovered in a bag in  
22 the same garage; is that correct?

23 A Correct.

24 Q Do you know if there was a mattress missing from  
25 one of the bedrooms upstairs; do you know which bedroom

1 that would have come from, the whole mattress?

2 A I can only articulate that there was not a  
3 mattress in the southeast bedroom.

4 Q Okay. Now, with regard to the east garage,  
5 bloodstains found in that garage, my understanding is most  
6 of them proved to be Margaret Brown's DNA; is that  
7 accurate? Or were there other people's blood as far as  
8 you know found in the east garage?

9 A It depends on where you're talking. Are you  
10 talking about non-moveable objects such as the wall?

11 Q Yes, non-moveable objects.

12 A Yes, my understanding is that was Margaret.

13 MR. SARABIA: Are you talking about the east  
14 garage or the west garage?

15 MR. MICHAÏLOS: East garage.

16 THE DEPONENT: Well, the east garage she was --  
17 my understanding her blood was found on the door  
18 leading to the hallway to the west garage.

19 BY MR. MICHAÏLOS:

20 Q Was any of her blood located and I don't mean  
21 now by moveable items, I mean like on the wall and stuff,  
22 was her blood found anywhere in the west garage?

23 A Yes, it was found -- may I refer to my report?

24 Q Sure, of course.

25 A That's going to be in my conclusions. So, we

1 already addressed the one by the door.

2 Q And I'm sorry I'm jumping around.

3 A No, that's fine. That was the primary place  
4 that her blood was found in the east garage but her blood  
5 was also found in the west garage.

6 Q Do you have any specificity where in the west  
7 garage her blood was found?

8 A The shelves on the refrigerator, the north wall  
9 and the door that we just talked about. They identified  
10 it as center room, center floor room door. Her blood was  
11 found on that door and the north wall of the garage.

12 Q The north wall of the garage?

13 A The north in the hallway.

14 Q Was that transfer blood in the door?

15 A In the hallway? On the door, it was transfer.  
16 In the hallway, there was transfer but there was also a  
17 small little impact area where the stains looked different  
18 and I can't remember if they tested that or not. I don't  
19 think they --

20 Q Are we talking about the room or the hallway?

21 A The hallway. The small cluster of stains I just  
22 referred to I do not have in my report that the blood was  
23 tested back to Margaret so that particular stain was not  
24 tested but the stain that had I believe the transfer did  
25 come back to her.

1 Q Now, I know you're in the conclusion area and  
2 I'm going to get there too but I'm also looking on page  
3 eight that's more describing the setting.

4 A The more technical part, okay.

5 Q And there's a mention on top of page eight,  
6 first paragraph, something about a form of conical  
7 patterns; is that the same thing that you're talking about  
8 now or something else?

9 A No, that's different. That is in the east  
10 garage is the conical pattern.

11 Q The conical pattern?

12 A Yes.

13 Q In the east garage?

14 A Correct.

15 Q Is that on the wall?

16 A Yes. It is on the --

17 Q North wall?

18 A It's on the north wall because the wall kind of  
19 comes up and then juts back a little bit and then you have  
20 the door that leads to the hallway to the west garage.  
21 It's like right over here on this corner so it would be  
22 the west end of the northeast wall.

23 Q Is that more of a spatter stain?

24 A Yes.

25 Q I know this isn't the most accurate science in

1 the world, it's difficult to say, but is it your opinion  
2 that this may have been when Margaret received trauma?

3 A Yes.

4 Q That would be the reasonable conclusion, right?

5 A Yes.

6 Q That did come positive -- that DNA was  
7 Margaret's on that stain?

8 A I believe the DNA that was tested in those areas  
9 came back either not interpretable or not enough DNA.

10 Q Okay.

11 MR. SARABIA: Which picture do you want? Do you  
12 want these pictures?

13 MR. MICHAÏLOS: Is that the hallway? That's the  
14 hallway.

15 MR. SARABIA: Yeah, this is the hallway in the  
16 west garage leading towards where the east garage  
17 would be.

18 MR. MICHAÏLOS: This is the hallway after  
19 exiting the west garage to go to the east garage; is  
20 that what you're saying?

21 MR. SARABIA: You keep saying exiting the west  
22 garage, it's really part of the west garage.

23 BY MR. MICHAÏLOS:

24 Q Okay. The hallway is part of the garage?

25 A Yes.

1 Q We're looking at a diagram of the first floor of  
2 this house which consists mostly of garage space but  
3 there's also a room in the back. And my question to you  
4 is if you could point out to me the walls where the blood  
5 was located in the east garage?

6 A In the east garage?

7 Q Correct.

8 A Okay. In the east garage this would be  
9 considered -- still is considered a north wall but it's  
10 next to the door that exits to the west garage hallway.  
11 There was blood right here, immediately next to the door.

12 Q Anywhere else in the east garage where you found  
13 blood on the walls?

14 A Yes, this would be the hand cart, this little  
15 square item.

16 Q Right.

17 A Near the north wall that would be the hand cart.  
18 There's a large pool of blood here and above the pool of  
19 blood there are -- there is a conical spatter pattern.  
20 There are what we call transfer and swipes that go up on  
21 the wall. And then, on this side over here, is where you  
22 have the possible spatter patterns and/or cast-off  
23 patterns that were enhanced with the chemical. So, some  
24 of the bloodstains were visible without chemical  
25 enhancement and then others became visible after physical

1 enhancement.

2 Q Okay. And then going to the west garage, where  
3 did you notice blood?

4 A As soon as you come in there's this doorway here  
5 in the west garage hallway that leads to room K, that door  
6 opens to the west. There was blood on that door.

7 Q That was probably transfer blood?

8 A That was transfer blood.

9 Q The blood we were talking about earlier on the  
10 northern wall was probably spatter as opposed to transfer?

11 A And/or cast-off.

12 Q And/or cast-off, thank you.

13 A Then, this wall right here, which would be the  
14 little south wall of the hallway, that had transfer  
15 patterns as well as something called passive drip stains.  
16 The wall directly across from it, the north wall, also  
17 exhibited transfer stains as well as a small pattern of  
18 cluster stains that could have also been a spatter event.

19 Q Okay. Any other -- I'm concerned more about  
20 spatter stains right now as far as honing into where the  
21 actual offense took place. Any other of those type of  
22 stains in the west garage, not transfer stains but spatter  
23 stains, if you will, or cast-off?

24 A I wasn't able to eliminate cast-off as a stain  
25 or pattern on the fridge. I cannot eliminate that.



1 Q Okay. So, that's possibly cast-off as well?

2 A Correct, and that came back to be Margaret's  
3 blood.

4 Q There were other items in the garage that  
5 exhibited spatter and cast-off stains but they were  
6 identified to a different individual. As far as Margaret,  
7 there's some blood on the refrigerator but you're not sure  
8 if it's cast-off?

9 A I can't exclude it.

10 Q You can't exclude it as cast-off?

11 A I cannot exclude it.

12 Q And you can't testify to a reasonable degree of  
13 certainty that it is cast-off?

14 A I just can't exclude it. I don't have a  
15 percentage I can give you. I can't exclude it.

16 Q And that refrigerator would be located on the  
17 east side of the west garage?

18 A Correct, and the vehicle would have been parked  
19 right here, the vehicle that you see in the photos, it's  
20 an SUV is parked there.

21 Q What kind of other non-transfer stains did you  
22 find linked to Margaret in the room K and the staircase?

23 A Those were the stains that were linked to  
24 Margaret.

25 Q Okay. And you did have a chance to review the

1 autopsy reports, correct?

2 A I did.

3 Q With regard to the autopsy report regarding  
4 Margaret Brown, and I don't have the report in front of me  
5 now, but I recall that the Medical Examiner had put in  
6 there a possible contributing cause of death was  
7 asphyxiation and you're probably not privy to his  
8 deposition but my understanding is he drew that conclusion  
9 simply because when the corpse was found there was a bag  
10 over the corpse. I don't think he was -- he didn't have  
11 this other evidence before him when he did the autopsy and  
12 drew his results. The evidence you've seen thus far would  
13 that be conclusive to the proposition to the fact that the  
14 bag would have been placed over Margaret after the trauma  
15 took place as opposed to before?

16 A Yes.

17 Q You would agree with that?

18 A Yes.

19 Q Because you don't have to be an expert to know if  
20 something is covered with a bag, you're not going to have  
21 the spatter results, right?

22 A Unless the bag is in some way damaged.

23 Q Damaged or has holes in it?

24 A Correct.

25 Q Okay. In the master bedroom there was Megan

1 Brown, there were stains on the floor near the bed that  
2 DNA tests showed was the blood Megan Brown, correct?

3 A Yes.

4 Q The sticker is a scale, that's what you call it?

5 A Yes, it's an L scale and here's a close-up of  
6 it. So, here's what we call an overall photograph where  
7 you can orient yourself and you can see the scales and  
8 this particular scale is at the foot of the bed. This is  
9 a mid-range shot, it still orients you to the bed but  
10 starts to give you an indication of the size of the stain  
11 and this is what would be considered a close-up  
12 photograph.

13 Q It's certainly not my expertise, looks like  
14 possibly a drop; is that fair to say?

15 A No, based on the size of the stain which is why  
16 you use these millimeter scales, that is more consistent  
17 in size with coming from a spatter event.

18 Q From a spatter?

19 A Yes.

20 Q And you can come to that conclusion because of  
21 the size of the circle, if you will?

22 A And the shape.

23 Q And the shape. That looks pretty circular to  
24 me; am I correct in saying that?

25 A Yes. Spatter can be circular. A lot of people

1 associate spatter with just having massive directionality  
2 but spatter will eventually succumb to something called a  
3 parabolic arc just like if somebody throws a football or a  
4 bullet gets fired, the amount of force to overcome gravity  
5 will only last so long unless that force is continuously  
6 applied. Like when you're driving a car, if you're  
7 pushing on the gas, you're going to keep going. But if  
8 you throw something, the force will eventually dissipate  
9 and it will succumb to what's called gravitational pull  
10 and it does it in an arcing format. So, when you have an  
11 open area like this, if you have blood distribution in  
12 that area and that blood doesn't have anywhere to adhere,  
13 it will succumb to parabolic arc and it will fall and it  
14 can be very difficult to find.

15 Q So, your conclusion that that's spatter as  
16 opposed to an isolated drop, can you put a percentage on  
17 that conclusion -- accuracy, as far as accuracy?

18 A I can't give you that type of percentage. I can  
19 just tell you that based on the experience and the  
20 hundreds of case file reviews that I've done that that is  
21 consistent with a spatter event and there's another one as  
22 well.

23 Q Okay. Let's see all those stains. Is it just  
24 two stains from Megan's blood?

25 A Two stains that were tested, yes. This is, once

1 again, the bed. This is now over here between the foot of  
2 the bed and the dresser. This is a close-up of that and  
3 this stain has succumbed to something.

4 Q This is close-up of which one, I'm sorry?

5 A This is a close up of the one that is over here.  
6 This is still consistent in size with a spatter event but  
7 it's also undergone an alteration called skeletonization.

8 Q Which means it's dried up and there's less of  
9 it?

10 A Correct, that it had started to dry and to some  
11 point during its drying process the center of the stain  
12 was removed leaving the peripheral edges and some of the  
13 interior.

14 Q You've read the autopsy reports, obviously.

15 A I have.

16 Q And Megan Brown she passed away because of a  
17 single gunshot wound to the left eye; is my understanding?

18 A Yes, to the eye. I don't remember if it was the  
19 left or the right eye.

20 Q By looking at those spatter stains is there any  
21 way you can asses or approximate where she would be  
22 located at the time that she was shot, if you will?

23 A No.

24 Q No way whatsoever?

25 A Nope.

1 Q You don't have enough information and plus you  
2 probably would need a lot of physics and mathematical  
3 calculations, right?

4 A Absolutely. You would have to have a certain  
5 amount of stains, a minimal amount of stains and that's a  
6 mathematical.

7 Q So, can we even approximate where -- can we come  
8 to a conclusion whether she was standing or sitting, for  
9 instance?

10 A I cannot.

11 Q And you can't place her for certain anywhere in  
12 that room?

13 A I cannot. I can just tell you based on the  
14 autopsy report that would be consistent with back spatter.

15 Q And back spatter means the blood would have come  
16 from the inside of her eye going forward?

17 A Correct. The blood would go in the direction of  
18 which the force was coming as opposed to following the  
19 force because there was no exit wound.

20 Q Right. And the blood coming out of the eye at  
21 an angle too, it doesn't necessarily come straight out,  
22 right?

23 A No, it's going to erupt out of whatever orifice  
24 is available, however it's available. So, if the side of  
25 the orbital is busted, it's going to come out the side.

1 It's a direct shot, it's going to be more conical.

2 Q All right. Thank you. In that same area in  
3 your report on page 13 you note that an individual  
4 contaminated with Nicholas Leonard's blood came into  
5 contact with the tile floor in front of the closet in the  
6 master bedroom. So, this is the master bedroom door  
7 obviously.

8 A Well, that's to the closet.

9 Q I'm sorry, closet in the master bedroom.

10 A So this is the master bedroom hallway leading to  
11 the bathroom, that's the general -- or, excuse me,  
12 mid-range shot, I meant to say close-up shot so you can  
13 see the sublet flooring is inside the closet and the tile  
14 is outside the closet and it's right there.

15 Q Right. And I meant to say the door to the  
16 master closet, it's like a walk-in closet?

17 A Yes.

18 Q Okay. So, it's more than just this drop area,  
19 this is the bigger part of the stain; am I right?

20 A Yes, it's transfer.

21 Q Is that -- what do you call it, a skeletal  
22 stain, is that it?

23 A It's been diluted.

24 Q Oh, diluted. But you wouldn't know how but you  
25 could have theories as to how that was diluted, right?

1 A Another liquid was introduced.

2 Q You know for a fact that's a transfer stain,  
3 obviously?

4 A Yes, that's a transfer stain.

5 Q And you're confident it would have to be an  
6 individual contaminated with Nicholas Leonard's blood?

7 A Yes.

8 Q Couldn't it be Nicholas Leonard who was actually  
9 stepping there?

10 A I do not believe so, no.

11 Q Why is that?

12 A Because I have to take in the totality of where  
13 the assault or the introduction of a blood shedding event  
14 that the blood at the scene supports, which is it occurred  
15 in the southeast bedroom.

16 Q Nicholas Leonard's injuries did?

17 A Correct. And that's based on the blood evidence  
18 present at the scene, the garage, the bedroom, items from  
19 the bedroom, et cetera. Also, the degree of injury that  
20 he sustained. There was no indication of Nicholas after  
21 sustaining bloodletting to his head that he maneuvered  
22 anywhere around the bedroom on his own accord just because  
23 typically when you have somebody who sustains severe  
24 multiple blunt trauma injuries you have what we have a lot  
25 of associated bloodstains, lots of transfers, lots of



1 swiping. You have multiple areas of pooled blood. You  
2 have areas where blood is dripping because it's a head  
3 wound, blood is dripping very quickly and we get a lot of  
4 what we call satellite spatters on areas. Plus, there was  
5 no indication of any of those types of stains or patterns  
6 that traveled from the bedroom -- pardon me, from the  
7 southeast bedroom to the master bedroom closet. There was  
8 no reciprocating stains that would allow me to believe  
9 that he, himself, as bleeding himself was able to transfer  
10 that stain in there himself.

11 Q What if he had a different injury before the  
12 severe trauma and had blood from a minor injury that had  
13 taken place earlier?

14 A That cannot be excluded, I cannot exclude that.

15 Q Okay. That's possible?

16 A That's possible.

17 Q When you notated in the report he did have an  
18 incisive wound, if I'm saying that right, to his left arm;  
19 did he not?

20 A Incised, yes.

21 Q Okay. So, theoretically, he could have been  
22 bleeding from that injury before suffering trauma to the  
23 head, correct?

24 A He could have but, once again, you have to take  
25 in to the totality of the injury as well as the biology of

1 the human body by nature, so an incised wound in the area  
2 that's allowed to bleed freely will also do the same as  
3 your head so I would have expected more passive drip  
4 stains. I would have expected transfers, swiping, I would  
5 have expected if the individual who deposited that by the  
6 closet had an actively bleeding injury, I would have  
7 expected to see more indication of that in that area and I  
8 did not.

9 Q Right, because that stain, in your opinion, is  
10 not an actively bleeding stain?

11 A That's a transfer, correct, that is blood that  
12 has been an item or an individual has gotten Nicholas'  
13 blood on him and has -- on themselves and has transferred  
14 the blood in that particular area.

15 Q Okay. As far as back to Megan in the bedroom,  
16 no other blood stains of Megan's in that bedroom that  
17 you're aware of?

18 A No.

19 Q And the reason why I'm bringing this up is there  
20 was another expert that was involved in this case that's  
21 no longer -- that's apparently not going to be called by  
22 the State but, at some point, I think he was relying on  
23 some stains I believe on a bureau or something that just  
24 were marks left after Luminol or Bluestar was used but not  
25 actual blood stains. Are you aware of anything like that?

1           A     I'm aware of stains. There are actually  
2 multiple more stains that were identified in this room  
3 with scale that have the characteristics that are  
4 consistent with a spatter event, there absolutely are.  
5 There are what appear to be stains that might contain  
6 tissue on the back rear wall. There were also small  
7 stains on the bureau that they identified with scale as  
8 well as what were considered to be passive drip stains  
9 that dripped down into the bureau drawer that was open.  
10 Upon -- typically, documentation process is done before  
11 any alteration of the scene occurs as far as when the  
12 technicians get there. So, what happens is you document  
13 areas that you believe there to be blood and you  
14 subsequently go behind and do blood testing. I did not  
15 include those areas in the analysis for one reason. They,  
16 at the scene, did not test positive for phenolphthalein  
17 which is an indicative test of blood.

18           I have to also take into consideration though the lot  
19 of tissue stains, some of them don't test positive for  
20 blood because their tissue. They don't have enough blood  
21 flow to test positive and the decaying of the stains in  
22 connection with the location or the substrate that they  
23 are on, so those are the stains that upon you're telling  
24 me --

25           Q     Right, right.

1           A     -- though I know what stains you're talking  
2 about, I don't recall those luminescing with Luminol. I  
3 do recall other areas in the master bedroom luminescing  
4 with Luminol.

5           Q     Real quick follow-up question, you couldn't  
6 approximate where Megan was located so you couldn't even  
7 narrow it down to less than 10 feet or anything like that?

8           A     If in utilizing the stains that were identified  
9 and photographed but tested negative with Phenolphthalein  
10 if permitted for me to include those then, yes, I could  
11 approximate her location.

12          Q     But the ones you're relying on you couldn't  
13 approximate at all, you couldn't even narrow it down to  
14 10 feet?

15          A     Correct. Here's the two on the back wall that  
16 looked like tissue that would have to be confirmed  
17 microscopically.

18          Q     These are the very same -- in the backboard  
19 area?

20          A     Correct, and they would be tissues so they would  
21 actually --

22          Q     But they didn't test positive?

23          A     With Phenolphthalein.

24          Q     So that would indicate they're not blood, right?

25          A     That would not exclude it completely but phenol

1 is a very competent chemical. This would be the bureau  
2 and the spatter stains were up in this area.

3 Q Okay. But you're not using those because you  
4 don't think it's reliable to use that simply because the  
5 Bluestar, the phenolphthalein was the one used in this  
6 test as opposed to the Bluestar?

7 A There's two different purposes for those items,  
8 yes. Phenolphthalein is a very strong presumptive test  
9 and, by my SOPs, when stains are tested with phenol and  
10 are indicated to be negative, I opt not to use them, so  
11 that's my SOP.

12 Q SOP meaning?

13 A Standard operating procedures.

14 Q And I'm going to keep saying phenol because I  
15 can't say the word.

16 A That's what we call it.

17 Q But is phenol more accurate than the Bluestar  
18 Luminol?

19 A Yes.

20 Q So, in your standard operating procedures, is  
21 that what an SOP is?

22 A Yes.

23 Q You wouldn't use that to base your opinions on?

24 A Correct, but that does not mean that somebody  
25 who does is incorrect based on the dynamics of this.

1 particular scene.

2 Q Well, if we were to incorporate those stains,  
3 which we're not, but if we were, they would still be  
4 coming from the same direction of the spatter that we  
5 have, right?

6 A Yes, and then based on those stains because they  
7 were multiple stains would be able to put a location to  
8 Megan or, excuse me, to the individual who deposited those  
9 stains.

10 Q Which we think is Megan?

11 A Which based on the other stains that can be I  
12 would feel comfortable saying.

13 Q But you're not giving that opinion, we're just  
14 making that clear?

15 A Correct.

16 Q But if we were to incorporate those, where would  
17 you place her?

18 A I would place her over by the bed.

19 Q By here?

20 A I would place her in this general vicinity over  
21 here because the blood would need to come back this way.

22 Q But with your SOP you don't feel confident  
23 within a reasonable degree of certainty relying on those  
24 other stains, correct?

25 A Correct.

1 Q There are no bloodstains that you're aware of on  
2 the other wall opposite this on the other side of this, is  
3 there?

4 A No, there is blood over here by the entry way  
5 that tested positive for Megan's, it was a transfer.

6 Q When you're coming through, it's a double  
7 doorway into the bedroom, right?

8 A It's a large door, yes. And as soon as you walk  
9 in the door, the curve starts towards that way and then  
10 you have the bedroom which is over here.

11 Q The left is the bathroom?

12 A Yes, it's like that big curve, decorative.

13 Q That we see right here at the top?

14 A Yes.

15 MR. SARABIA: Real quick while he's going  
16 through that. You said you can't place Megan  
17 anywhere in the room based on scenes you have, can  
18 you place Megan in the room?

19 THE DEPONENT: Yes.

20 MR. SARABIA: I wanted to clarify that. So what  
21 you meant by can't place her anywhere in the room,  
22 you meant anywhere particular in the room?

23 THE DEPONENT: Right. I can't give you an area,  
24 what we would call an area of origin but I can place  
25 her in the room for that spatter event.

1 MR. SARABIA: Okay.

2 BY MR. MICHAÏLOS:

3 Q Now, let's look if you have pictures of the  
4 living room, Megan's blood was found in the living room  
5 and the living room stains that were positive for Megan's  
6 blood would have been, I would think, transfer stains,  
7 right?

8 A They are small drip stains.

9 Q Small drip stains?

10 A Yes, deposited by --

11 Q Someone else?

12 A An individual contaminated with Megan's blood  
13 that was in small relative motion close up to the wall.

14 Q So your opinion would be it wasn't Megan that  
15 left those stains? Well, it's her blood.

16 A It's her blood, I can't exclude her.

17 Q You can't exclude her, but it's also consistent  
18 with somebody else dripping off her blood?

19 A Sure.

20 Q And that would be a drip trail?

21 A That would just be a passive stain. Right  
22 there, there's one, two.

23 Q Where is this wall in this picture?

24 A Right here.

25 Q Right there?



1           A     Yes, so this would be [REDACTED]'s room or let me  
2 rephrase that, that is a room that appears a child lives  
3 in, that southeast bedroom would be over here.

4           Q     And the master is --

5           A     The master is over here, it's right there.

6           Q     That could have been somebody passing by who is  
7 contaminated with her blood that dripped off somebody  
8 else?

9           A     Yes.

10          Q     You can't say one way or the other?

11          A     I can't.

12          Q     I'm looking on page 14, describe the east  
13 garage. In the beginning you talk about a spatter event.  
14 Am I correct in assuming this is referring to the things  
15 we pointed out to on the diagram earlier?

16          A     Yes.

17          Q     This is ground we've covered in other words?

18          A     Correct.

19          Q     Could you, in your expertise, come to an  
20 conclusion whether or not Margaret was standing or lying  
21 down when these spatter stains were --

22          A     Well, the ones that are on that wall radiate out  
23 fairly high, like middle of the wall and up, so I can't  
24 place her completely down on the floor for some of them.  
25 But there is another conical spatter pattern on that wall

1 that is low to the floor which would be the -- actually,  
2 the patterns actually radiate out from the pools of blood  
3 so there's actually spatter patterns on the floor.

4 Q And that's on the northern wall of the east  
5 garage?

6 A That's on the floor and the north wall. Yes,  
7 there's two conical spatter patterns that radiate out from  
8 the pool of blood which are consistent with a spatter  
9 event going two different directions, heading in two  
10 different directions.

11 Q You're gesturing, looks like three or four feet  
12 apart or more?

13 A Yeah, the one large stain here and these expand  
14 out to the west and then there's a smaller area of pooled  
15 blood over here that expands out to the east and then  
16 they're interrupted. These over here actually are  
17 altered.

18 Q And then there's a big saturation stain there,  
19 is that what you call it on the ground?

20 A It's pooled, there's a difference.

21 Q I know I'm jumping around but in the master  
22 closet where I assuming Greg's body laid, there's a  
23 saturation stain that's in the unfinished wood, right?

24 A Correct.

25 Q Would that be a pool stain or a saturation

1 stain?

2 A That is a saturation. By definition, saturation  
3 is an absorbent material.

4 Q In the garage, it's cement, it's not going to  
5 absorb as much, it's going to pool?

6 A Right. Technically, if you called it a  
7 saturation you wouldn't technically be wrong because  
8 cement is porous but, by the nature of the sealants and  
9 things that go on, it gave characteristics more of pooled  
10 blood.

11 Q Okay. Thank you. So, we're looking at a  
12 photograph of the east garage and it's a very large  
13 bloodstain around the two-wheel hand cart?

14 A The hand cart, I think is what it is. And then  
15 you see you have transfer stains up here that have  
16 sufficient blood volume in them such they're called  
17 downward flow patterns so that is transferred by an item  
18 or an individual who was heavily saturated with blood, so  
19 that's the significance of that. That is not somebody who  
20 has got a faint amount of blood on them, that is  
21 significant in the definition of that.

22 Then, this is your pool of blood. This is what I  
23 call the large pool of blood and, right here, you can see  
24 these long conical -- first of all, the individual stains  
25 themselves are very elongated and they travel at a pretty

1 far distance and they form what we call a conical pattern,  
2 which conical is just that, it's a cone. Some people call  
3 it a fan.

4 Q So if I draw lines, that's what you mean by  
5 cone?

6 A Yeah, correct.

7 Q The angle would be opening up?

8 A The angle would be.

9 Q Right.

10 A So that would be considered a conical pattern  
11 and that is consistent with a spatter event which is  
12 basically blood being distributed by a certain amount of  
13 force. You have the same phenomenon over here from this  
14 separated small area of pooled blood. These stains are  
15 very elongated and they form a small conical pattern and  
16 this would be a separate spatter event because of the  
17 directionality of the stains. The introduction of the  
18 force was a different direction so those are two separate  
19 spatter events. And then this one was subsequently  
20 altered after its deposition by transfer stains.

21 Q Like somebody tried to wipe it or it was wiped?

22 A It's a transfer stain, something bloody was set  
23 down on to it, something bloody came into contact with it,  
24 it just allowed me to sequence the two. I can say that  
25 came first and then that came second.

1 Q So would your -- in your expertise would your  
2 theory be this is Margaret's blood, obviously, right?

3 A I don't know if that blood was -- I don't  
4 believe that blood was tested.

5 Q Okay.

6 A So, it could be Margaret's blood, yes.

7 Q Was this blood tested?

8 A I believe some of them were and they came back  
9 as being non-interpretable or not enough DNA.

10 Q Where was Margaret's blood found? We know it  
11 was found in the east garage.

12 A Right, it was found over by the door and it was  
13 found in the west garage in the hall and I believe on the  
14 door. I don't have the full DNA. I don't have the full  
15 list with me.

16 Q All right. But is it possible this bloodstain,  
17 you believe this is blood spatter, this conical stain, but  
18 could there be other explanations for this? Could this be  
19 a dead body that's been moved here and when it's moved  
20 with its hair strands moving it leaves a pattern like  
21 that?

22 A No, that's not a swipe pattern. That is from an  
23 impact of blood. I cannot exclude that something was  
24 dropped and hit the ground, that's still a spatter event.

25 Q So this could be something dropped and hitting

1 the ground?

2 A Correct.

3 Q As gory as this may be, this could be a corpse  
4 that's dropped and the head hits the ground and it makes  
5 that?

6 A Could be.

7 Q At some point you think that the body lay there  
8 long enough to leave this big pooling stain?

9 A Yes, a body laid there for a substantial amount  
10 of time because the blood -- that's what we consider to be  
11 a large volume of blood and it followed the topography of  
12 the floor and started to saturate into the floorboard, the  
13 baseboard here.

14 Q Right. Obviously, you're not an MD, a corpse  
15 can still bleed hours afterwards; do you know?

16 A That's a question for the Medical Examiner.

17 Q You don't know. Page 16 of your report at the  
18 top you talk of a cluster of small stains could have been  
19 caused by minor spatter event; you see where I'm at over  
20 here somewhere?

21 A Yes, we discussed that. That's the north wall  
22 of the hallway in the west garage that's right above a  
23 transfer stain.

24 Q Repeat that again.

25 A The north wall of the west garage hallway.

1 Q Okay. Was that close to the ground?

2 A No, that was -- those were what I would consider  
3 to be an upright transfer stain. When I say upright, I  
4 mean they're not prone or supine on the ground.

5 Q So, the victim would have been standing there  
6 probably, probably would have been standing when she  
7 received that blow?

8 A That spatter event, yes, conducive with an  
9 upright position.

10 Q The next paragraph you talk about individual  
11 made contact with the south wall also had an actively  
12 bleeding injury.

13 A Yes. All right. So this is the north wall.

14 MR. SARABIA: For the record, I think he's going  
15 back to one of the previous questions.

16 MR. MICHAÏLOS: Correct.

17 THE DEPONENT: There's the labels.

18 BY MR. MICHAÏLOS:

19 Q Right, right.

20 A See the little scales, the little sticky scales?

21 Q Right.

22 A That's the small spatter event because your  
23 stains are small but dispersed in a slightly conical --  
24 and they have directionality.

25 Q Okay.

1 A And there's a defect.

2 Q Defect in the wall?

3 A Correct.

4 Q Could be unrelated to this?

5 A I have no idea. It looks fairly new but that's  
6 out of my realm of expertise.

7 Q This picture would it be like is this the floor  
8 and is this the ceiling; do we know?

9 A Yes.

10 Q That sounds about right to you?

11 A Yes.

12 Q So, directionality is it's coming down?

13 A Correct.

14 Q Is that the down directionality?

15 A Correct.

16 Q Gravity?

17 A These are from a spatter event because of their  
18 elongation with the tail.

19 Q Right, but gravity plays a role in going down?

20 A Not necessarily if the source of blood is very  
21 close to the wall and the blood is able receive the blood  
22 immediately, it will not be subjected to the parabolic arc  
23 because of the proximity of this wall, these two walls to  
24 each other. So when you do an analysis you have to look  
25 at the dynamics of the whole scene and this wall would



1 have been logical for the individual to be in this  
2 confined area because that area is confined, it's a small  
3 hallway. So, I don't believe that these drops are from  
4 the parabolic arc, A, because of where they're located on  
5 the wall you would have to assume that they in that small  
6 area went way up and had a very drastic parabolic arc  
7 which, by the laws of the physics, I wouldn't even  
8 consider it that's why I feel as though this spatter event  
9 indicated the individual was close to the wall and the  
10 wall was able to receive the blood right away.

11 Q Right. But after the wall received the blood,  
12 it doesn't dry immediately so wouldn't gravity on the wall  
13 maybe allow for it to drip just a little bit?

14 A No. Bloodstains are very viscous and when  
15 they're that small gravity is not going to -- because  
16 blood --

17 Q This is blown up, this photograph is blown up?

18 A Correct.

19 Q That's probably what's throwing me off.

20 A Yeah, these stains are small, these are  
21 millimeters. So you think these stains are maybe two  
22 millimeters in width and I would say probably not even two  
23 milliliters so we're talking about tiny stains.

24 Q Okay. So you think that the person who suffered  
25 the injury was close to this wall?

1 A Correct.

2 Q Could you say within a foot?

3 A No. You would have to do a mathematical  
4 calculation for that.

5 Q Which stain is this one in the bigger picture;  
6 do you know?

7 A I believe it's right above a transfer stain, so  
8 I believe it's right there.

9 Q That would explain, that's a transfer stain?

10 A That is actually not. That is a -- because you  
11 see how the spline come out, it's a transfer stain under a  
12 certain amount of -- a little bit of force but you also  
13 have to take into consideration that the wall broke that  
14 up so you have to take into consideration the source. So  
15 this blood stain has more volume in it, it's not a spatter  
16 stain. It's more consistent with a large volume up  
17 transfer stain getting broken up when it gets distributed  
18 on this wall.

19 Q So, not a spatter stain, probably a transfer  
20 stain?

21 A Correct.

22 Q Give me an example how you leave a stain like  
23 that via transfer?

24 A If you go up like this.

25 Q You got me confused there for a second.

1 A Because it's looks completely different than  
2 that transfer stain.

3 Q It looks completely different than that one,  
4 right? Okay. And this one is in the same wall, right?

5 A Correct.

6 Q And this is after the phenol is put on?

7 A That is something I believe they used Hungarian  
8 red or something called Hungarian red otherwise known as  
9 acid fuchsin. I refer to it just as a chemical.

10 Q Is that a different part of the wall? It must  
11 be a different part of the wall, right?

12 A No, it's the same part of the wall, it's that  
13 stain right there.

14 Q Okay. And this is afterwards?

15 A Correct.

16 Q They did this before and then they put this on  
17 later?

18 A Yes. If possible, you photograph stains prior  
19 to any chemical enhancement.

20 Q Did this chemical enhancement help you at all in  
21 your work?

22 A It has ridge detail in it so it leads me to  
23 believe that it's either a hand or a foot. I have no  
24 reason to believe it's a foot.

25 Q So, it's a transfer on the wall?

1 A It's a transfer with ridge detail, yes.

2 Q So, you think it's probably a hand?

3 A I do because it's got the dynamics of a hand.

4 Q Somewhere in here, bloody feet, a person with  
5 bloody feet, so in the west garage there was some  
6 footprints?

7 A Yes.

8 Q Bare footprints?

9 A Yes.

10 Q Were they enhanced with the chemical or they  
11 were clearly footprints?

12 A There were two that were clearly footprints and  
13 then with Luminol they came out, that trail was beautiful.  
14 I am talking about like used in training beautiful. And  
15 it's a foot trail, like you can see almost looks like a  
16 ghost.

17 Q While he's getting that, the mattress behind the  
18 SUV with the pillow top, that blood, did that come back to  
19 Nicholas? I'm assuming it did. Do you know?

20 A On the mattress topper. The mattress itself  
21 wasn't tested.

22 Q Wasn't tested?

23 A Correct. You can actually see it without  
24 enhancement here.

25 Q Okay. Very good.

1           A    And then this is it looks like they applied  
2 another chemical, I believe, like I said, it's acid  
3 fuchsin or Hungarian red and then here's a trail.

4           Q    That's in the west garage, right?

5           A    Correct.

6           Q    Near the northern wall?

7           A    No, over in the empty bay, this empty bay. See  
8 where these tires are and there's all this, it's literally  
9 the path goes from here and walks up here.

10          Q    From the bay door?

11          A    Yes.

12          Q    And the bay door would be the south part of the  
13 house?

14          A    Correct. I mean you can see footprint,  
15 footprint.

16          Q    But is it clearly the stain -- what's this  
17 called purple --

18          A    Some call it Hungarian red, some call it acid  
19 fuchsin.

20          Q    But it reacts with blood to leave that stain?

21          A    Correct.

22          Q    You wouldn't have this purple if there wasn't  
23 blood?

24          A    Correct.

25          Q    Before they put the Hungarian red or whatever

1 they put on there, you still had an outline of footprint,  
2 right?

3 A Correct.

4 MR. MICHAÏLOS: I don't think I have any more  
5 questions.

6 MR. SARABIA: I don't have any more questions.

7 (THEREUPON, the deposition was concluded.)  
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CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF PASCO

I, the undersigned authority, certify that Anna Marie Cox personally appeared before me and was duly sworn.

Witness my hand and official seal, this 26th day of October, 2017.



Karla Josephik

## CERTIFICATE OF REPORTER


STATE OF FLORIDA

COUNTY OF PASCO

I, Karla Josephik, Court Reporter, certify that I was authorized to and did stenographically report the foregoing proceedings and that the transcript, pages 1 through 56, inclusive, constitute a true and correct record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor do I have an interest in the outcome or events of this action.

Dated this 26th day of October, 2017, New Port Richey, Florida.

  
Karla Josephik