



November 10-13, 2023

Synopsis

This case involves what is commonly referred to as a “No Body Homicide.” In May of 2022, an alleged DUI car crash occurred which involved Jesse Saucedo in one car and Aaron and Lauren Miller in the other car. Ms. Miller is now a quadriplegic with little to no chance of ever having a normal life. Saucedo was prosecuted for DUI, which resulted in a plea with a minimal sentence. An enraged Miller threatened Saucedo’s life. Saucedo suddenly disappeared in January of 2023. Even though no body has ever been located, the prosecution alleges that Mr. Saucedo is dead and that Mr. Miller murdered him.

Questions/Revisions

If you spot errors or have questions, submit them to Keith Hill at hillk@sacda.org with a subject line titled Fact Pattern Questions no later than October 6, 2023. We will release a revised version on or before October 13, 2023.

Rights, Distribution, Disclaimer, Acknowledgements

We would like to thank Matt Chisolm for allowing us to very loosely base this fact pattern off one of his recent homicide trials. Matt has been an excellent factual resource and contributed many great ideas that have been included throughout the fact pattern. Extremely long hours have been put into creating the final case file and special thanks go out to the members of the Gold Cup Committee for assisting in the review and revisions of the problem. Last, but certainly not least, we thank Aaron Miller for allowing us to slander his otherwise impeccable character. He is an all-around good guy and certainly not a violent gang member.

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OFFICIAL RULES

2023

General

1.1 Competition Rules

- a. Requests for interpretation of these rules should be sent in writing to the Gold Cup Challenge Coordinator, Keith Hill at HillK@sacda.org. The Coordinator will issue a written response to each inquiry. All participating teams will receive a copy of the question and the response.
- b. The Gold Cup Challenge Rules committee, in their sole discretion, will interpret these competition rules, and their decisions are final.
- c. Supplemental Rules – The Gold Cup Challenge Rule committee, in their sole discretion, may create additional rules to address situations not presently covered by these competition rules.

1.2 Professional Conduct

- a. The conduct of all participants in the competition, including team members and coaches, will be governed by the standards set out in the ABA-Model Code of Professional Responsibility and the ABA-Model Rules of Professional Conduct. One team competing in the national competition may be awarded with a professionalism award.

Teams

- 2.1 A team must consist of four law students attending the same ABA-accredited law school. For the purpose of these rules, a law student is a person enrolled in law school during the semester or quarter of the competition. Only students who are candidates for a J.D. or L.L.M. degree may compete.
- 2.2 Team members may not be substituted, except for exigent circumstances, such as death, severe illness, or other uncontrollable and unforeseeable circumstance, and two members must participate in each trial.
- 2.3 Each team will be randomly assigned a letter at the conclusion of the Coaches' Meeting. This will be the sole method of identifying a team during the competitions. Participants and coaches may not divulge the names of their law school directly or indirectly to the judges or witnesses.
- 2.4 In every trial, two team members will serve as attorneys and two other team members will serve as witnesses. In each trial, each attorney must perform one direct examination, one cross examination, and one speech (opening or closing). An attorney may only object to a witness examination if she is

also examining that witness and may only object to a speech if she is performing the opposing speech (e.g., only the person crossing the defendant may object to the defendant direct, and only the attorney who opens for the defense may object to the prosecution opening).

2.5 Before the tournament, teams will announce the gender pronouns of their witnesses and those identifications will be provided to all teams.

Competition Problem

3.1 The case problem used for this tournament is copyrighted and may not be used for purposes other than its intended use without the express written consent of the author. Teams may not download any portion of this case problem to any website without the express written approval of the host committee.

3.2 The persons, organizations, and events depicted in this problem are fictional and were prepared solely for the educational exercise of this tournament. Any resemblance to actual persons, living or deceased, is unintentional and purely coincidental.

3.3 The Federal Rules of Evidence and the Federal Rules of Criminal Procedure will control unless stated in the problem or otherwise modified by the rules. Otherwise, no legal authorities may be cited during trial except those included in the case problem.

3.4 All witness statements, depositions, photographs, diagrams, and other material included as part of the problems shall be deemed as originals and authentic. In addition, all signatures are authentic, and all documents that appear to have been sent to or by a witness are to be considered as having been sent or received by that witness. Witnesses must authenticate exhibits and materials with which they are familiar.

3.5 Copies of any material contained in the fact pattern may be made and may be enlarged for demonstrative purposes. However, no team may alter, modify, change or redact an exhibit in ANY way. Exhibit stickers may be removed for enlargements. Teams may also bring with them and use a flip chart or white board for the purpose of drawing demonstrative diagrams during the round (subject to any appropriate objections by counsel).

Conduct of Trials

4.1 This tournament adopts the Modified Model Rules of Conduct for Mock Trial Competitions. In instances where the Model Rules and these Local Rules conflict, the Local Rules control.

4.2 Coaching of a team, including conversations, notes, texting, emails or gesturing, is prohibited during a round, INCLUDING recesses and breaks.

4.3 Handwritten summaries or charts to be used during a closing argument may not be prepared before the time both sides have rested, and the evidence is closed. But materials created while examining a witness during a trial may be used during the closing argument of that same trial.

4.4 Teams may read substantive stipulations into the record with leave of court at any time during the trial. This time will NOT count against the total allotted time of 60 minutes.

4.5 All trials will be conducted as if a jury were present. The presiding judge will make no ruling that precludes the trial from being presented to conclusion.

4.6 The presiding judge may or may not direct counsel to approach the bench or seek leave of Court before introducing evidence.

4.7 When questioning a witness, team members may either sit or stand. However, no comment should be given as to why one method or the other was chosen.

4.8 Time Limits

- a. Each team will be allocated 60 minutes, exclusive of time spent on motions and objections, to present and argue its case. The burden for the effective use of time is on each team. The clock shall be stopped for objections and responses to objections.
- b. Each team will be allocated an additional 8 minutes to make and respond to motions in limine.
- c. Bailiffs will be provided for each round and will keep track of the remaining time for each team. However, coaches or advisors are encouraged to keep track of the remaining time on their own. Should a significant discrepancy arise regarding the remaining time for any team during a round, that coach or advisor must immediately contact Jesse Saucedo (909) 268-1387 or Keith Hill (916) 204-7955. That person, or a designated representative from the Protest Committee, will consult the bailiff, coaches/advisors and, if necessary, scoring judges, to determine the appropriate remaining time. Once a determination has been made, that decision will be final.

4.9 Motions

- a. Motions in Limine may be presented, but must be made orally and not in writing (with the exception of the written Opposition to a Motion to Suppress). The presiding judge will be instructed that he/she may rule on any motion(s) or may defer a ruling on the motion(s).
- b. An oral motion to exclude witnesses or "invoke the rule" may be offered. The presiding judge will rule on the motion, but in no event will any witness or other person be required to actually leave the courtroom.

4.10 Witness Testimony

- a. The prosecution must call Colin Stephenson and Leland Washington as witnesses. The defense must call Teal Ericson and Andrea Morris as witnesses. No other witnesses may be called in the preliminary rounds and witnesses may not be recalled. A witness may be called only by the directing team and may not be recalled by either side. Neither side may call a witness of the other party.
- b. Witnesses may testify as to reasonable inferences drawn from the case material on non-material facts, such as a witness's background. For example, it is reasonable for a witness playing a police officer to infer that he/she completed a police academy.
- c. During the presentation of their cases, team members and their witnesses may use only the facts contained in the problem, and team members are prohibited from enhancing their position by presenting testimony about material facts not contained in the problem. For example, if the

record is silent, it is not a reasonable inference for a witness playing a police officer to testify that he/she finished at the top of his/her class at the police academy. If during a direct examination a witness testifies to a material fact not contained in the case materials, the witness may be impeached during cross examination through impeachment by omission. A witness must admit that the fact was suggested by counsel or that the witness him/herself made up the material fact, if true.

- d. During cross examination, an advocate may question the witness about non-events that are reasonable inferences based on the problem materials. For example, if a police officer witness is testifying and the record is completely silent relating to fingerprints, it is reasonable to assume the police officer witness did not collect fingerprints from the crime scene. In this example, it is permissible to ask the police officer witness "You never collected any fingerprints, correct?" However, an advocate may not invent facts or use outside resources in their questions to enhance the cross examination of a witness. For example, if a police officer witness is testifying and the record is completely silent relating to fingerprints, an advocate shall not reference topics outside of the problem materials such as; the reliability of fingerprints, the process of fingerprint collection, etc. In this example, it is not permissible to ask the police officer witness, "You're aware that margin of error for fingerprint analysis can be as high as five percent, correct?" Nevertheless, if a witness gives a responsive answer to a question that takes him/her beyond his/her prior testimony, the cross examiner may not then try to impeach the witness by omission. Only when a witness volunteers a material fact at trial not mentioned in his/her prior testimony where it would have been logical and necessary to have included such fact in order to provide a responsive answer or to provide a true and complete narrative may the witness be impeached by omission. The purpose of this rule is to prevent unfair or frivolous impeachment of witnesses on account of facts that are missing through no fault of their own.
- e. The presiding judge may not entertain the objection that a particular question calls for information "outside the scope of the record." An answer to a question is not objectionable on the ground that it is outside the scope of the record. Except during closing argument, no objection shall be made that the opposing team is "going outside the record", and any breach of the rule shall be addressed by means of impeachment. Witnesses MUST admit, if asked that the facts they have testified to are not in their deposition or otherwise in the record. Witnesses may NOT qualify this admission in a misleading way by saying, for example, that they were not asked about those facts in their deposition, or those facts were contained in some other portion of the deposition which was omitted from the record. The answer should simply be "No, I did not say that in my deposition". The judges will be instructed concerning the significance of this form of impeachment in the mock trial context, and they are likely to account for unfair additions to the record in their scoring of the witness' team.
- f. The following jury instruction can be argued in Closing argument if a team feels their opponent's witnesses added facts not contained in their depositions, or reasonable inferences from the facts in their depositions:

In this case, each witness has given a prior statement. Each witness later reviewed his or her statement and certified the statement was true and correct and that s/he had no information relevant to the matters discussed in his/ her statement that was not already included in the

statement. If a witness has provided information today that differs from, or is in addition to information contained in his or her statement, you should consider that witness' entire testimony with great caution.

- g. Because witnesses cannot be recalled, cross-examination is not limited to the testimony on direct examination. This rule does not include re-cross examination.
- h. Redirect examination is permitted.
- i. Re-cross is permitted only if (a) to impeach the witness as to a contradiction or invention testified to on redirect examination and (b) the attorney seeking to re-cross first obtains leave to do so from the presiding judge upon an offer of proof.

4.11 Exhibits and Jury Instructions

- a. Teams may enlarge, in whole or in part, any exhibit, jury instruction, or other component of the case file for demonstrative purposes. Copies of any material in the case file may be made and enlarged for demonstrative purposes. No team may alter, modify, change, or redact any exhibit in any way. This rule does not apply to redactions ordered during a round by the presiding judge. Teams may use flip charts or white boards for the purpose of creating demonstrative exhibits during the round (subject to any appropriate objection by counsel)
- b. With the exception of the option to play the 911 call, no technology (Power Point, etc) may be used during any portion of the trial.

4.11 Objections

- a. Objections must be brief, limited to the legal basis, and applied to the specific facts at issue.
- b. Time consumed by objections is not charged against either team; however, the presiding judge, in the judge's sole discretion, may order time charged against any team that makes excessive objections or uses excessive time to argue or respond to objections.

4.12 Closing Statements

- a. The order of closing statements will be as follows: Prosecution, defense, prosecution closing rebuttal.
- b. Prosecution's closing rebuttal is limited to the scope of defendant's closing.
- c. Prosecution may request to reserve time for their closing rebuttal. The bailiff should be notified of the requested time prior to the beginning of prosecution initial closing statement.

Pairings and advancement

5.1 Pairings

- a. Teams will be initially ranked based on Fordham's 2022-2023 Trial Competition Performance Rankings.

- b. Each team will be placed in a bracket. There will be four brackets and four teams in each bracket. Each team will face all other teams in their bracket once for the first three rounds.
- c. Placing the teams into four pots: the top four ranked teams go in Pot 1, the next four teams go in Pot 2, the next four teams go in Pot 3, and the remaining four teams will go in Pot 4.
- d. During the coaches meeting, we will draw the groups live. A team will be selected from each Pot beginning with Pot 1 and proceeding to Pot 4. The first team selected from each pot will go into Group A, the second into Group B and so on until all four groups are filled and the pots are empty.

5.2 Advancement

- a. The fourth round will be a blind (ghost) Quarterfinal Round. The top two teams from each group will advance to the Quarterfinal Round. Eight teams will advance to the Quarterfinal Round based on the following criteria: (1) win-loss record; (2) number of judge's ballots won; and (3) Motion to Suppress ranking. Those teams that advance to the Quarterfinal Round will be paired according to a power protection format in reference to each school's ranking on Fordham's 2022-2023 Trial Competition Performance Rankings. The remaining teams that did not advance to the Quarterfinal Round will be paired against one another for the fourth round. **Whether eliminated or not, ALL advocates will be eligible for the cash prizes during the first four rounds.**
- b. As best as practicable, teams in the Quarterfinals will be power protected according to Fordham's 2022-2023 Trial Competition Performance Rankings. However, an exception will be made when a particular power protection match would result in a team not having an opportunity to present as prosecution twice and defense twice. In that instance, the next closest power protected pairing will be chosen.

Protests

- 6.1 Protest Procedures - Violation of any rule governing the Gold Cup Challenge may subject the offending team to disqualification. The spirit of the competition will be considered in determining whether a breach of the rules should result in disqualification from the competition. Taking into consideration that the competition is to be conducted as realistically as possible, would the breach of the spirit of the competition have resulted in a lawyer being held in contempt in an actual trial? If so, the spirit of the competition has been breached and would constitute grounds for disqualification.
- 6.2 In order to lodge a protest where a team believes that an opponent/witness has made up a material fact during a witness examination, the advocate must confront the witness on cross-examination (or re-cross-examination for this limited purpose) by way of impeachment by prior inconsistent statement or impeachment by omission. Then, once the round has been completed, the team representative (coach or advisor) must lodge the protest with the Protest Committee within ten minutes of the conclusion of the trial. Failure to follow this process will result in a team's forfeiture

of their ability to protest the alleged violation. **Note: If the Protest Committee believes a protest was frivolous, it may impose a remedy against the protesting team.**

- 6.3 Protests may be lodged only by coaches/advisors. All protests should be lodged as soon as possible and may be lodged no later than ten minutes of the conclusion of the trial. Notification should be made by text message to Jesse Saucedo at (909) 268-1387 or Keith Hill at (916) 204-7955. Host committee members will serve as the Protest Committee members.
- 6.5 The Protest Committee will evaluate if any offense has been committed and, if so, the appropriate remedy. **If the Protest Committee believes a protest was frivolous, it may impose a remedy against the protesting team.** The Protest Committee is authorized to impose one or more of these remedies: warning; instruction to the judges; point deduction; ballot forfeiture; round forfeiture. Separate from the remedies imposed by the Protest Committee, the committee is authorized to disqualify teams that violate tournament rules. A disqualified team is not entitled to a refund of its registration fee.
- 6.6 Protests are a last resort and discouraged. Teams must attempt to resolve the dispute during the trial or with their opponent before lodging a protest.

Motion to Suppress

- 7.1 Each team will submit a brief on the issue prompted below.
- 7.2 A brief shall not exceed 3500 words. A team may rely on the word count of the word processing system used to prepare the brief.
- 7.3 While a brief's format is largely left to a team's discretion, judging will be based on a number of factors, including the substance of the arguments, quality of the writing, citation form and the document's overall appearance. Teams need not include a table of authorities or a table of contents. If included, these tables will count against a team's word count.
- 7.4 Each team must serve an electronic copy of its brief and the certification required to Jesse Saucedo at saucedoj@sacda.org. The e-mail must arrive by 11:59 p.m. PST on October 22, 2023.
- 7.5 All citations should conform to the most recent edition of A Uniform System of Citation (commonly known as The Bluebook).
- 7.6 The pdf file name must start with the word "team," followed by the team number. All letters must be lower case, and there can be no space between the word "team" and the team number (e.g., team101). The team number will be provided prior to the submission date of the brief.
- 7.7 The electronic document must contain only a copy of the submitted brief. The document must not contain appendices. The brief must be a single document.
- 7.8 A team must include, in the lower right corner of each page, the team's numeric designation. No information serving to identify the team or its law school, other than its numeric designation, may be included anywhere in the brief.

7.9 A team must include, as a separate document in pdf form, a signed certification in the following form: "We hereby certify that our brief has _____ words." In addition, the certification should include the team number, the law school name, the team members' printed names.

7.10 Prompt

Prior to trial, defense filed a motion to suppress all evidence found inside the van (specifically the gun, drugs, tools, tarp and evidentiary swabs) due to an alleged violation of Defendant's Fourth Amendment right from Officer Colin Stephenson's search on January 21, 2023. From the position of the prosecution, and using any fact, statement or exhibit from the case file to support your position, write an opposition to defense's motion to suppress. You may utilize *People v. Bush* (2001) 88 Cal.App.4th 1048, and the cases cited therein, as your authority. Your brief must not only address the strengths of your position but also the weaknesses of your position with persuasive rebuttals.

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4 Attorneys for Prosecution

5 SUPERIOR COURT OF CALIFORNIA,
6 COUNTY OF GOLD
7

8 THE PEOPLE OF THE STATE OF CALIFORNIA,)
9 Plaintiff,)
10 vs.)
11 AARON MILLER)
12 Defendant)

Case No. 23FE187187

PRETRIAL ORDER

13
14 **General**

- 15 1. The government has charged defendant Aaron Miller with a single count of first-degree
16 premeditated murder. The defendant has pled not guilty. The parties may not amend the
17 pleadings at trial.
- 18 2. The Gold County Superior Court has proper jurisdiction over this matter. This
19 jurisdiction has adopted the Federal Rules of Criminal Procedure, and Federal Rules of
Evidence.
- 20 3. The only legal authorities that may be cited at trial are this Pretrial Order, the Jury
21 Instructions, Jury Verdict Form, Federal Rules of Criminal Procedure, and Federal Rules
22 of Evidence.
- 23 4. The prosecution must call Colin Stephenson and Leland Washington as witnesses. The
24 defense must call Teal Ericson and Andrea Morris as witnesses. No other witnesses may
be called in the preliminary rounds and witnesses may not be recalled.

25
26 **Exhibits**

- 27 5. The parties have submitted a Joint Exhibit List, which is attached to this order. Exhibits
28 retain their pre-marked numbers regardless of the order they are introduced. At trial, the
parties may not offer into evidence any exhibits other than those on the joint exhibit list.

1 6. If exhibit 9 is admitted the parties may play the audio with a phone laptop or speaker.

2 **Evidentiary Rulings**

3 7. All witnesses are pre sworn and constructively sequestered.

4
5 8. If the defense intends to put on character evidence under Federal Rules of Evidence 404,
6 608, and/or 609, the Defense must provide written notice to the prosecution at least 30
7 minutes before the round. This is because the prosecution is not permitted to put on a
8 rebuttal case to rebut such character evidence. All other notice requirements under the
9 federal rules of evidence have been satisfied.

10 9. The prosecutors may not comment on Defendant's exercise of his right against self-
11 incrimination. All other objections arising under the Constitution and its Amendments are
12 overruled.

13 10. Evidence objections that will be entertained are those concerning items on the Joint
14 Exhibit List.

15 **Stipulations**

16 11. All witness statements, reports, and interviews, including the 911 call are accurately
17 transcribed.

18 12. Exhibit 1 is an authentic document that qualifies as a public record under FRE 803(8)

19 13. Exhibits 11 and 12 are both authentic documents that qualify as records of regularly
20 conducted activities under FRE 803(6) requiring no certificate or testimony from a
21 custodian.

22 14. Exhibits 5, 8, 19 and 20 are authentic and accurately describe the information contained
23 therein.

24 15. Exhibit 6, the Forensic Laboratory Report and Exhibit 7, the Missing Persons Report are
25 stipulated to be admissible.

26 Date: 8/24/23



27 Judge Celeena Wall

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5 SUPERIOR COURT OF CALIFORNIA,
6 COUNTY OF GOLD

7
8 THE PEOPLE OF THE STATE OF CALIFORNIA,)
9 Plaintiff,)
10 vs.)
11 AARON MILLER)
12 Defendant)

Case No. 23FE187187

JOINT EXHIBIT LIST

EXHIBIT NUMBER	DESCRIPTION
1	Red Light Camera photo of two cars colliding at an intersection
2	River City Riders Logo
3	Cooperation Agreement for Leland Washington
4	Text string between Washington and Miller
5	RAP Sheet of Leland Washington
6	Lab Report
7	Missing Person Report
8	RAP Sheet of Aaron Miller
9	911 Recorded Call
9A	911 Call Transcript
10	Social Media Post of Jesse Saucedo
11	Medical Records of Lauren Miller
12	Bank Records of Jesse Saucedo
13	Reward Flyer
14	Single photo of tools in a bucket
15	Single photo of a handsaw
16	Police Report
17	Single photo of red substance on handsaw
18	Single photo of tarp located in van
19	RAP Sheet of Keith Hill
20	RAP Sheet of Jesse Saucedo
21	Single photo of red substance on tarp

1 THIEN HO
2 DISTRICT ATTORNEY
3 901 G STREET
4 GOLD, CA 95814
5 (555) 555-6218
6
7

8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF GOLD**

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA,

No. 23FE187187

12
13 vs.

INFORMATION

14
15 AARON MILLER,

16 Defendant.
17

18 The People of the State of California upon oath of the undersigned, upon information and belief
19 complain against the defendant above named for the crime(s) as follows:
20

21 **COUNT ONE**

22 On or about January 20, 2023, at and in the County of Gold, State of California, the defendant,
23 AARON MILLER, did commit a felony, namely: a violation of section 187(a) of the Penal Code
24 of the State of California, in that said defendant did unlawfully, and with malice aforethought
25 murder JESSE SAUCEDO, a human being.
26

27 I declare upon information and belief and under penalty of perjury that the foregoing is true and
28 correct.
29

30 Executed at Gold County, California, the 1st day of August 8, 2023.
31

32
33 

34
35
36 KITTY TETRAULT
37 GOLD COUNTY DISTRICT ATTORNEY
38 (555) 555-6218
39 Telephone Number
40
41

1 People vs. AARON MILLER (Case No: 23FE187187)

2 PRELIMINARY HEARING TRANSCRIPT OF **LELAND WASHINGTON**

3 =====
4 DIRECT EXAMINATION BY COURTNEY MARTIN

5 Q: Good morning Mr. Washington what do you do for a living?

6 A: What does it look like? I sit around in a cell all day. Sometimes I get to serve food if
7 that counts.

8 Q: How long have you been in jail?

9 A: For about 6 months now. Trumped up murder charges. I might have never got out if
10 I hadn't cut a deal.

11 Q: What do you mean when you say cut a deal?

12 A: You know as well as I do. If I testify against Miller in this case they will lower my
13 charges to a False Imprisonment and I won't have to go to prison at all. Maybe just a
14 little local time and I have credits to cover it. All I have to do is tell you what he did.

15 Q: Prior to going to jail what did you do for a living?

16 A: I was employed by Aaron Miller in his painting and drywall construction business.

17 Q: How was the work?

18 A: It was tough and sometimes dangerous. You could easily fall and injure yourself or
19 cut yourself on our sharp tools.

20 Q: What types of tools did you use?

21 A: You know, the basics, things like tarps, brushes, jigsaws, hand saws, hatchets,
22 etcetera

23 Q: Did it pay well?

24 A: Not really, the only time I was going to make any good money was when Miller
25 offered to give me \$25,000.00 for a "special job" that he had for me.

Q: How do you know Mr Miller?

1 A: We are both part of the same “charitable organization” here in town. I’m sure you’ve
2 seen our big year end event at Christmas – Bikes for Tykes. He doesn't really flaunt his
3 membership, but I know he keeps his vest somewhere to wear to meetings.

4 Q: Tell me more about this charitable organization?

5 A: I think I will plead the 5th on that. We are a secret society.

6 Q: What was this special job?

7 A: We still have our deal right? You can't use this against me? I think that’s what it says
8 in that paper. Yeah, EXHIBIT 3, that’s our deal.

9 Q: You’ll be fine. Just answer the question.

10 A: He wanted me to kill Jesse Saucedo and make sure nobody ever found him. Cut him
11 up and dump the pieces in the river.

12 Q: Did he tell you why he wanted Saucedo killed?

13 A: He said something about a car crash where Saucedo nearly killed him and his wife.
14 Sounds like she is on life support and in a pretty bad way. He said the court just gave
15 Saucedo a slap on the wrist and he deserved a whole lot more than that.

16 Q: How were you supposed to do it?

17 A: He said it didn’t really matter as long as Saucedo was dead and there was nothing
18 pointing back at him. He made a slicing move with his finger along his neck. He had a
19 big bucket of tools that he said I could use if I needed them.

20 Q: What kind of tools?

21 A: A saw, a hatchet and a bunch of other sharp stuff. I’m a pretty tough guy but I
22 started to have second thoughts.

23 Q: Why?

24 A: I didn’t know this Saucedo guy or have any beef with him. But the money was really
25 tempting for a guy like me.

Q: Did you do it?

A: Do you really think I would tell you if I did do it? No! I told him that I couldn't kill
nobody. So he told me to just grab him and rough him up a bit. He said he would take
care of the rest.

1 Q: How much did he pay you?

2 A: I got \$10,000.00 up front. I was supposed to get the rest later. But he never paid me,
3 the slimy bastard.

4 Q: Did you do the job?

5 A: I did what he paid me to do and what I agreed to do.

6 Q: What does that mean?

7 A: I grabbed the guy when he was walking into his house. And then I beat the snot out of
8 him. He looked like a smashed tomato when I was done with him. I put duct tape over
9 his eyes and I bound his hands and feet with zip ties.

10 Q: What did you do after that?

11 A: Exactly what I was supposed to. I waited until it was dark, wrapped him in a blanket,
12 threw him over my shoulder and walked him outside where I threw him into my sidecar
13 and drove him over to Miller's house. It was a "Weekend at Bernies" kind of situation.

14 Q: Who was there when you got there?

15 A: Miller was there along with another big scary dude from our "charitable
16 organization." I think his name is Keith Hill, but he goes by Hammer. They were sitting
17 outside the garage drinking beer with the door up.

18 Q: What else did you see?

19 A: I could see that the van was in the garage and the back was open. There was a tarp
20 laid out on the ground. And I could see some of the tools sitting out in the back of the
21 van. I'm pretty tough, but it still freaked me out.

22 Q: So what did you do?

23 A: I grabbed Saucedo out of my sidecar, threw him over my shoulder, and dumped him
24 on the ground at their feet.

25 Q: How did Miller react?

A: He just smiled and said "Take a good look, this is the last time you'll ever see him."

Q: Did you ever see him after that?

A: Are you kidding me? Of course not!

Q: Did he ever pay you what he owed you for the job?

1 A: No, he just kept ducking me. Finally I texted him “you better pay me or else” and he
2 responded “I paid you what the job was worth”. Yeah, EXHIBIT 4 is a copy of our texts.

3 Q: What did you do then?

4 A: I wanted nothing more to do with them, so I just let it go.

5 Q: This isn't the first time you've been in trouble with the law is it?

6 A: You know it's not. You've got my rap sheet right in front of you

7 Q: I'm going to ask you some questions about your prior convictions.

8 A: Ask all you want, but you're not getting anything else out of me.

9 Q: If you won't answer now, we can just take it up in court.

10 CROSS EXAMINATION BY RYAN ROEBUCK

11 Q: Do you consider yourself an honest man?

12 A: For the most part, it just depends on the situation.

13 Q: You certainly weren't honest when you were convicted of Felony Perjury on 5/13/14

14 A: I was just trying to help out a buddy and I took it a little too far.

15 Q: But you don't deny the conviction, do you?

16 A: No, but it was a stupid little family court thing. It wasn't a big deal.

17 Q: What about your Welfare Fraud arrest from 3/2/14?

18 A: I've got mouths to feed at home. Sometimes you have to take extreme measures to
19 take care of them. I just remember I got reported for it. I don't remember anything after
20 that.

21 Q: And you were charged with attempted murder of someone else back in July of 2013

22 A: The jury didn't quite see it that way. Well, at least two of em' didn't. I walked right
23 out the front door of the court when the trial was over. Can we just get on with this? I
24 don't have all day.

25 Q: And finally, you were convicted of being a Felon in possession of a firearm in 2015,
weren't you?

A: Not my gun, but I pled out to take the fall for a buddy who needed help.

1 Q: It's fair to say that you're getting a pretty good deal for testifying here today?

2 A: Not really, I'm still getting a Felony no matter what happens.

3 Q: You were charged with Murder for what you did to Mr. Saucedo. And you were
4 looking at life in prison.

5 A: That piece of trash got exactly what was coming to him.

6 Q: Just answer the question!

7 A: That's true, but now it's just a False Imprisonment and no prison.

8 Q: And all you have to do is help the prosecution convict my client.

9 A: Listen, they were trying to hit me with LIFE! I would help convict Mother Theresa
10 for that kind of deal. But it's easier this way since I'm telling the truth!

11 Q: We'll see about that!

12 JUDGE: Counsel – lets avoid your commentary and just ask your next question.

13 Q: In working for Mr. Miller you had access to his van and all his tools, right?

14 A: I couldn't do the job without them.

15 Q: That included tarps, saws, hatchets, duct tape and other tools.

16 A: All the tools to do the job, whatever that job may be.

17 Q: At the time of this incident you were working on a big remodel job for Mr. Miller
18 down in the Fab Forties on one of the Tudor Mansions, weren't you?

19 A: So what if I was?

20 Q: That's the job that the two of you were texting about, wasn't it?

21 A: I don't recall. It might have been. I thought we were talking about the Saucedo job.

22 Q: But that's not what it says, does it?

23 A: I guess not. I could have been more clear.

24 Q: That charitable organization you were talking about was the River City Riders,
25 wasn't it?

A: You got me there. I didn't want to mention it because we get a bad rap from people
who don't understand us. They lump us in with other biker gangs like the Hell's Angels.
Sure, we have a few bad apples that give us a bad name, but most of us are pretty legit.

Q: Aren't you one of those bad apples with your convictions over the years?

1 A: Everything on my RAP is accurate and that's all I will say about it. Let's just say
2 I'm not really a friend of the cops.

3 Q: Certainly not on 1/21/23 when you ran from them while driving the company van?

4 A: I thought they were a rival "charitable organization" and they were out to get me. I
5 was running for my life.

6 Q: What you were running was meth and guns wasn't it?

7 A: No way. I didn't even know that stuff was there until the cops pulled it out. Maybe
8 they planted it, I don't know.

9 Q: What do you mean by that?

10 A: I couldn't see what he was doing because they locked me in the back of the police
11 car. I yelled at him out of the window that I am not on searchable parole/probation and
12 he had no right to search the van.

13 Q: How did he react when you did hat?

14 A: Even though I never gave consent, he searched the van anyway. They searched every
15 nook and cranny of that van no matter how big or small the area was. That Stephenson
16 dude has had it out for me for a long time and I felt like he was doing his best to get me
17 with something that day. He tore the van apart and claims he "found" the gun and drugs
18 in the spare tire compartment under the tire. He also got really excited while he was
19 searching through our tools and stuff.

20 Q: What do you mean that he has it out for you?

21 A: I live in a pretty tough neighborhood over in Oak Park. He was always harassing me
22 and my buddies. Making comments about how "you people don't do anything
23 worthwhile" and how all we do is just "bang and commit crimes." We couldn't go
24 anywhere or do anything without him harassing us.

25 Q: How do you explain the smell of bleach and all the tools in the van?

A: It's a work van man! We need tools and sometimes we clean up after ourselves.


Q: Or maybe you're the one that killed Saucedo and needed to clean up after.

A: Not me, you need to talk to your client! I'm taking my deal and I'm out of here.

///
///

1 I have carefully reviewed the above preliminary hearing transcript to determine whether
2 the answers contained are true and correct and whether I had any additional information
3 relevant to the matters therein. I hereby certify, under penalty of perjury, that the
4 transcript is accurate, and I have no information relevant to the matters discussed other
5 than what is discussed in this transcript. Everything was covered and nothing was left
6 out.

7 Dated: 8/11/23



Leland Washington

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1 **People vs. AARON MILLER** (Case No: 23FE187187)

2 PRELIMINARY HEARING TRANSCRIPT OF **TEAL ERICSON**

3 =====

4 **DIRECT EXAMINATION BY RYAN ROEBUCK**

5 Q: Good Morning Ms. Ericson. Can you please tell us about yourself.

6 A: Well, I am 23 years old and I work as a librarian at the Jason Schaff Middle School. I
7 am recently married and I'm hoping to start a family. I have lived here in Gold County
8 my whole life. I just love our City of Trees!

9 Q: How is it that you became involved in this case?

10 A: My dad is Jesse Saucedo and he is missing. I am trying to do anything that I can to
11 make sure that we find him.

12 Q: How is it that you came to be testifying for the defense today?

13 A: When my dad went missing I was doing everything I could to find him. I was out in
14 the community and trying to bring visibility to his case. I was sent a subpoena by the
15 defense and told that I needed to come to court to tell you all everything I know based on
16 my efforts to find my dad. I didn't think I had a choice and I am willing to do anything to
17 bring visibility to the case to help me find him. I miss him terribly.

18 Q: What was it that you did to try to bring visibility to his case?

19 A: I put together some reward money and I put up flyers all around town asking people
20 to call the police if they had any information at all that could help us find him.

21 Q: Showing you this EXHIBIT 13. Do you recognize it?

22 A: Yes. That is the flyer I made and posted all over. The picture is my dad and the
23 phone number is for the police tip line.
24

25 ///

1 Q: Were the police being helpful to you?

2 A: Absolutely not! They just wouldn't take me seriously. They kept saying that they
3 thought he was murdered and they stopped looking. They're not doing anything and it's so
4 frustrating. If they aren't going to find him, then I will. He needs to be found before
5 something happens.

6 Q: What are you afraid is going to happen?

7 A: If I'm being honest, I'm afraid he might hurt himself.

8 Q: Why do you think that?

9 A: After the car accident he became extremely depressed. He has just been out of sorts
10 and feels a tremendous amount of guilt. He says things like "it ought to be him in that
11 hospital bed and not her." He has made some other statements that really scare me like
12 that "he just can't take it anymore."

13 Q: Has he said anything else to you about how he feels or what's going on in his head?

14 A: He feels like everyone in town is judging him. He can't go anywhere without getting
15 sideways looks. He's made a couple of statements like "maybe he should just try to start
16 all over again somewhere else." I don't know what I would do without my dad.

17 Q: When was the last time you saw him?

18 A: I think it was in January, somewhere around the 19th.

19 Q: What were you doing?

20 A: We had decided to meet up for breakfast at Cafeteria 15L. It was nice to see him, but
21 he was acting so paranoid. He kept looking around and didn't seem to be paying attention
22 to our conversation.
23

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1 Q: Could you see what he was looking at?

2 A: There was this big scary looking guy a few tables over. He was just having a drink
3 and never ordered any food. That seemed weird to me. I couldn't figure out why he kept
4 looking at us.

5 Q: Can you describe him?

6 A: He was tall and buffed with a shaved head. Maybe 6'2" and about 250 pounds. I
7 think the waitress called him Hammer or something like that.

8 Q: What was he wearing?

9 A: Jeans and a dark vest with no shirt underneath. When he got up I could see it had
10 some type of logo with words on it above and below the logo. I couldn't tell what it said
11 and I couldn't make out the picture. Maybe it was some kind of bird.

12 Q: Please look here at EXHIBIT 2 and tell me if you recognize it.

13 A: I really don't know. I only got a really quick sideways glance. That might be it, but I
14 thought it was more of an animal than anything else.

15 Q: So what happened then.

16 A: Breakfast was over so I told my dad I loved him and gave him a kiss. I didn't like
17 how our breakfast ended so I went over to his house the next day to try to talk to him
18 some more.

19 Q: What happened when you went to see him?

20 A: It was strange, when I got to the front door it was cracked just a little bit but I decided
21 to go in to make sure he was OK. I was still afraid of what he might do.

22 Q: What did you find when you went inside?

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1 A: The house was trashed. Things were toppled over and spread out all over the floor.
2 When I went into his bedroom the closet doors were open and there were clothes strewn
3 all over the place. My first thought was that we had been burglarized so I called the
4 police.
5 Q: Take a listen to EXHIBIT 9 and tell me if you recognize it.
6 A: Yeah, that's me. Its kind of embarrassing to hear my voice like that, but I was scared
7 to death.
8 Q: Was your dad there?
9 A: No. He was gone.
10 Q: Does your dad have any luggage?
11 A: He has a suitcase and a couple of duffle bags. I don't recall seeing them there, but to
12 be honest I wasn't really looking for them.
13 Q: Was there anything else that made you think there might have been a burglary?
14 A: My dad keeps a safe in the closet. The safe was open and it was empty.
15 Q: Do you know what's normally kept in the safe?
16 A: He usually kept his passport, important papers, valuables and a reserve of cash. It was
17 all gone.
18 Q: Anything else?
19 A: I called the bank to see if there had been any strange charges on the cards that we
20 normally keep in the safe.
21 Q: What did you find out?
22
23
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1 A: They told me that all of our accounts were completely drained. Other than that, not
2 only was there no strange activity, but there had been no activity at all since the accounts
3 were emptied.

4 Q: Why do you think that testifying here today is going to help find your dad?

5 A: The more publicity the better. Somebody out there knows something and we need to
6 find out what happened to him and where he is.

7 Q: Since that last breakfast you had together have you seen or heard from your dad?

8 A: No. I can't believe he would leave me this way. We have never gone this long
9 without talking.

10 Q: So what is your plan now?

11 A: I'm just gonna hope that someone sees him somewhere or that he suddenly comes
12 back. What else can I do?

13 Q: Thank you Ms. Ericson I have no further questions

14
15
16 CROSS EXAMINATION BY COURTNEY MARTIN

17 Q: You know that your dad was in a car accident with the defendant?

18 A: Yes. And I feel terrible for what happened to them.

19 Q: He put Mrs. Miller into a coma and rendered her a quadraplegic?

20 A: Yes. He's not a perfect man.

21 Q: If somebody had done that to your mom you would want to retaliate, wouldn't you?

22 A: Probably, but its hard to say when I'm not actually in that situation.

23 Q: Since you put up your flyers, your dad still hasn't been found?

24
25

1 A: No. There have been a couple of tips but they just didn't pan out. I really feel like
2 the police have arrested Mr. Miller and aren't interested in doing anything else. I just
3 have to believe my dad is out there somewhere.

4 Q: Despite offering a \$5000 reward for information, as far as you know nobody has said
5 they have seen him?
6

7 A: Unfortunately no.

8 Q: So for all you know he is dead and gone?

9 A: I don't know what happened to him, I just need to know the truth.

10 Q: As you sit here today, you have absolutely no evidence that he is alive, do you?

11 A: I guess not, but I have no evidence that he is dead either.

12 Q: You just testified that you think he might have been depressed, but you are not
13 qualified to make a mental health diagnosis are you?
14

15 A: Not technically, no. I have no training or experience beyond personal experience.

16 Q: And you've never mentioned your concern to anybody prior to today?

17 A: We don't air our dirty laundry.

18 Q: Isn't it true Mr. Miller paid you for your testimony?

19 A: No. He just gave me a few thousand dollars to help me stay ahead of my bills. He
20 seems like a kind man. I can't believe you think he had something to do with my dad's
21 disappearance.
22

23 Q: And after he paid you, you agreed to testify for him?

24 A: Yes, but you're twisting it up and making it seem like something it's not.
25

1 Q: Let's talk about your final moments with your dad at that breakfast. In addition to
2 being paranoid, is it also fair to say he seemed scared?

3 A: Yeah, he was just not himself. His focus was definitely on that big bald guy and not
4 on me.

5 Q: So the last time you saw him he was still at the restaurant with the bald guy nearby?
6

7 A: Yes. I wasn't comfortable about it but I needed to get to work.

8 Q: When you got to your dad's house later that day you found it to be a mess?

9 A: Yes. My dad would never leave the house looking like that. It was usually quite
10 tidy.

11 Q: But that mess could also have been caused by a struggle or a fight, couldn't it?
12

13 A: I suppose so. There were a couple of drops of blood on the floor. I just thought
14 maybe he had a bloody nose or cut himself or something. It wouldn't be the first time.

15 Q: It's fair to say that you don't know what happened that day? Just that he is gone and
16 blood was left behind?

17 A: Yes. But I just can't bring myself to believe that he was killed like you say.

18 Q: You confirmed that there was no activity on his bank account after that day?
19

20 A: That's true.

21 Q: And no posts on his social media accounts?

22 A: None

23 Q: Showing you EXHIBIT 10, do you recognize that?

24 A: Yes. That is his very last post on social media. He had captioned it as being "back
25 when life was good." The picture is from my little cousin's birthday party last year –

1 about a month before the crash. It's pretty strange because he and I used to joke that he
2 was a serial poster. I doubt he ever ate anything that he didn't take a picture of.

3 Q: And no phone calls or texts?

4 A: No.

5 Q: Thank you. I have no further questions.

6
7 I have carefully reviewed the above preliminary hearing transcript to determine whether
8 the answers contained are true and correct and whether I had any additional information
9 relevant to the matters therein. I hereby certify, under penalty of perjury, that the
10 transcript is accurate, and I have no information relevant to the matters discussed other
11 than what is discussed in this transcript. Everything was covered and nothing was left
12 out.

13 Dated: 8/11/23



Teal Ericson

1 **People vs. AARON MILLER** (Case No: 23FE187187)

2 PRELIMINARY HEARING TRANSCRIPT OF **ANDREA MORRIS**

3 =====
4 DIRECT EXAMINATION BY RYAN ROEBUCK

5 Q: Good Morning Ms. Morris. Can you please tell us about yourself?

6 A: I am a very young 68 year old woman. I have a degree in Archeology from Gold
7 State University. My first 20 years I worked on various excavations throughout the US
8 where I specialized in the recovery and dating of large predatory dinosaurs. It was there
9 that I developed a keen eye for detail that I later put to work as a claims specialist at a
10 local insurance company when field work became too much for me.

11 Q: Where do you live?

12 A: I live at 3681 44th Street. A nice quiet neighborhood that is a wonderful place for me
13 to live out my golden years.

14 Q: Are you still working?

15 A: Oh heavens no! I retired about 5 years ago and I spend most of my time gardening
16 and organizing our Neighborhood Watch. You should see my Camellias. They are the
17 pride of the Gold County Camellia Festival.

18 Q: Tell me about your Neighborhood Watch?

19 A: I have been widowed for about 5 years now and I really felt a need to be connected
20 and get out of the house to do some good in my community. Crime seems to really be
21 going up and I wanted to do everything I could to help keep our neighborhood safe. We
22 have never had a problem around here and I want to keep it that way.

23
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1 Q: So how does it work?

2 A: We have regular monthly meetings where we get together to discuss any issues that
3 might come up and organize events to build unity among our neighbors. We aren't too
4 militant. We just all agree to keep our eyes open and watch out for one another. It has
5 worked well so far.

6 Q: Do you know Jesse Saucedo?

7 A: Of course I do. I make it my business to know everyone on the block. He lives next
8 door, just over the hedge. He's a wonderful man and my heart goes out to him.

9 Q: What do you mean?

10 A: He lost his wife a few years back and he took it real hard. He kind of lost himself in
11 the bottle if you know what I mean. It was only a matter of time until something like this
12 happened. I worry that it may have put him over the edge.

13 Q: How have you handled that?

14 A: I take a nice homecooked meal over to him every once in a while and we sit and chat.
15 He confided to me that he feels like he has dug himself a hole that he may not be able to
16 get out of. He worries me when he says things like "he destroyed his future and those
17 around him." There are days when he says he can't get out of bed and I can tell when
18 he's been crying. I've tried to visit as often as I can to help him feel better. But he
19 doesn't seem to need me anymore.

20 Q: What do you mean?

21 A: He's got a new sweetie. I've met her a few times – that beautiful blonde model
22 AshleyP. I've seen them come and go together when I'm out tending my flowers.

23 Q: When was the last time you saw him?

24

1 A: He must be out of town. I am used to seeing him every day, but he's been gone since
2 about January 20th. That's my birthday and we normally celebrate it together, but not
3 this year. Normally when he is going to be out of town we make arrangements for me to
4 tend to his house and his yard; take in his mail, that kind of thing. But I haven't heard a
5 peep this time.

6 Q: What makes you think he went out of town?

7 A: Well, it was pretty late at night after my birthday party. I always keep my eyes and
8 ears open as part of the Neighborhood Watch, you know. I heard a commotion next door
9 and went to my window to check it out. I have no idea what he was up to.

10 Q: What did you see?

11 A: The noise stopped after a minute or two and things quieted down. It was pretty dark
12 since the streetlight burned out. I've been begging the city to fix it, but they haven't
13 gotten around to it. I saw him come out the front door and walk down the street. At least
14 I thought it was him. He had a really big bag slung over his shoulder so he must be going
15 away for awhile. That was the last time I physically saw him.

16 Q: Why do you say it like that?

17 A: The next morning I was making breakfast when I heard something going on over at
18 his house again. This time it was AshleyP. She had pulled up in her fancy Tesla and was
19 banging on the front door yelling that he "better hurry up or they would miss their flight."

20 Q: Then what happened?

21 A: My toast started burning and set off my smoke detector so I had to go take care of it
22 and I couldn't hear anything else over the noise. When I came back they were gone.

23 Q: Thank you Ms. Morris. I have nothing further.
24
25

1 CROSS EXAMINATION BY COURTNEY MARTIN

2 Q: You don't have any degrees or special training in Psychology or depression do you?

3 A: No I don't. I wouldn't know a specific diagnosis if it jumped up and bit me. It was
4 just a general feeling I had.

5 Q: At what point in time did you notice it?

6 A: It was pretty much right after he got out of jail. He just seemed so down about life.
7 Then AshleyP came into his life and he seemed to perk back up. That last week he
8 seemed like he was back to his old self.

9 Q: It never got bad enough that something needed to be done did it?

10 A: Not really, it was more just a really bad case of the blues. I know I went through the
11 same thing after my husband passed.

12 Q: You never did anything more about it than just be a listening ear?

13 A: Nope. That was it. Nothing one of my famous apple pies can't fix.

14 Q: Had you noticed anything out of the ordinary before he disappeared?

15 A: Now that you mention it, our street is normally pretty quiet. But there had been this
16 guy riding around on a motorcycle. I saw him maybe three or four times just going up
17 and down the street. I considered calling it in, but when I came outside and we locked
18 eyes he took off.

19 Q: What was he doing?

20 A: I have no idea. He just seemed to be going back and forth, looking around. It
21 seemed like he slowed down as he went by. He seemed to be looking at Jesse's house. I
22 told Jesse about it and he look worried.

23 Q: What did he say about it?

24
25

1 A: He told me to keep a lookout and call the police if I saw him again.

2 Q: Did you ever need to do that?

3 A: No. The next day Jesse was gone and I never saw that guy again.

4 Q: How would you describe him?

5 A: He certainly didn't look like anyone that belonged in our neighborhood. We don't

6 drive Harleys and we look dignified.

7 Q: And he didn't look dignified?

8 A: He was pretty scary. A mountain of a man, with a bald head and gang clothes.

9 Q: Gang clothes?

10 A: Yes. He looked like one of those Hell's Angels or White Supremacists. He had on

11 one of those black leather vests with stuff on the back.

12 Q: What kind of stuff?

13 A: He was never going slow enough for me to quite make it out. I could only make out

14 the words "River" and "God." It also had some kind of picture, like something with

15 wings.

16 Q: Why didn't you call the police?

17 A: It's not illegal to drive around looking like a thug. I just decided to let him know I'm

18 watching him. It must have worked because he didn't come back.

19 Q: On the night you heard the banging it was dark out?

20 A: Yes. And it was harder than normal to see with that streetlight out.

21 Q: What kind of light did you have?

22 A: Just the moon and a couple of porch lights. The big beautiful trees on our street keep

23 a lot of light from coming through. I really just saw shadows and outlines.

24

25

1 Q: The person you saw come out of the house was not Jesse was it?

2 A: I can't say one way or another. He was pretty big, I just assumed it was Jesse.

3 Q: Besides being big you couldn't see anything else about him?

4 A: I couldn't see his face since he was walking away from me and he was wearing black
5 so it was even harder to see.

6 Q: You can't confirm with any certainty that it was Jesse, can you?

7 A: No. I can't be sure.

8 Q: That man was carrying something pretty big over his shoulder?

9 A: Yes. It looked like he was struggling to carry it.

10 Q: But it wasn't a suitcase was it?

11 A: No. It seemed to be maybe a big long duffle bag or something.

12 Q: What had you been doing right before?

13 A: I had been watching Murder She Wrote and dozed off in my armchair. I must have
14 been out for a bit because it was over by the time the noises started. I went to grab my
15 glasses but I accidently knocked them under the chair. So I just went to look without
16 them. Things were a bit fuzzy but I could still easily see what I saw. I mostly just need
17 my glasses for reading.
18

19 Q: Describe the sounds you heard prior to the guy coming out.

20 A: There was a bang and then I heard somebody yell and then more banging. I was just
21 about to call 911 when it got quiet again. A few minutes later I saw him leave. Nothing
22 else happened so I just went to bed.

23 Q: Where did he go?

24

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1 A: I don't know, it was too dark. I heard him drive away. I didn't see what he was
2 driving because he went the other way and didn't come by my house.

3 Q: The next morning was when you saw AshleyP?

4 A: She was banging on the door.

5 Q: You don't know what happened after that? Other than your toast burning?

6 A: Right. I don't know if she went in or if he came out.

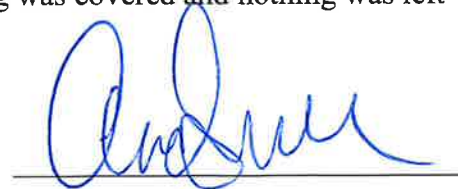
7 Q: In fact, you don't know if he was even there?

8 A: No. I never saw him. When I got back to the window after dealing with my toast
9 there was nobody outside and her car was gone. Those newfangled electric cars are so
10 quiet.

11 Q: Thank you ma'am. Nothing further.

12 I have carefully reviewed the above preliminary hearing transcript to determine whether
13 the answers contained are true and correct and whether I had any additional information
14 relevant to the matters therein. I hereby certify, under penalty of perjury, that the
15 transcript is accurate, and I have no information relevant to the matters discussed other
16 than what is discussed in this transcript. Everything was covered and nothing was left
17 out.

18 Dated: 8/11/23



Andrea Morris

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23FE187187
EXHIBIT 1

RIVER CITY RIDERS



GOD FORGIVES - WE DON'T

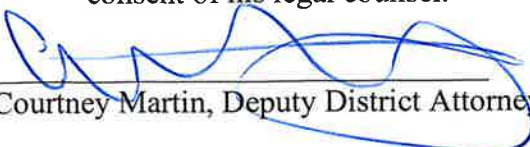
23FE187187
EXHIBIT 2



AGREEMENT FOR COOPERATION AND TESTIMONY

This document is intended to memorialize in writing the understandings between the Gold County District Attorney and Leland Washington regarding the murder of Jessie Saucedo. The parties agree to the following:

1. COOPERATION WITH INVESTIGATORS – Leland Washington agrees that he will cooperate fully and completely with Investigators and the District Attorney during the investigation and prosecution of this case;
2. TRUTHFUL TESTIMONY – Leland Washington agrees that when called upon to do so, he will provide full and truthful testimony in open court. Testimony may be required in more than one hearing or trial;
3. ACCESSORY TO MURDER - In exchange for truthful testimony and cooperation as set forth above, the District Attorney agrees that following the completion of all required testimony, Leland Washington may enter a guilty plea to False Imprisonment, a felony, with a promise of no state prison at the outset;
4. PERJURY – Leland Washington agrees and understands that this agreement does *not* confer upon him any form of immunity for perjury or false swearing in connection with any testimony provided in this case;
5. VIOLATION OF AGREEMENT - It is agreed and stipulated that if either party believes there has been a violation of this agreement, that violation shall be determined by a preponderance of the evidence standard before a judge and the burden of proof shall be upon the party alleging said breach;
6. NO OTHER AGREEMENTS – Leland Washington acknowledges that all understandings and agreements between the parties are contained within this document, and any amendments or modification shall be in writing;
7. ADVICE OF COUNSEL – Leland Washington has read and understands the content of this agreement and enters into said agreement freely and voluntarily, upon the advice and consent of his legal counsel.



Courtney Martin, Deputy District Attorney

8-11-2023

Date



Leland Washington

8/11/23
Date



Ryan Roebuck, Attorney for Washington

8/11/23
Date

February 9, 2023 8:57pm

I TOLD YOU I WANT
MY MONEY AND
YOU HAVE DONE
NOTHING TO PAY
ME FOR THE JOB!

YOU OWE ME
\$25,000 YOU
BASTARD! PAY UP
OR YOU'LL REGRET
IT!

YOU DIDN'T
FINISH IT OFF! I
HAD TO TAKE
CARE OF IT
MYSELF. YOU
GOT \$10,000 SO
CONSIDER
YOURSELF
LUCKY YOU
EVEN GOT THAT.

JUST LET IT GO
AND IT WILL BE
EASIER FOR ALL
OF US!



PHOTO DATE
5/14/21

CRIMINAL RAP SHEET

SUBJECT NAME: WASHINGTON, LELAND
SSN: XXX-XX-9834
DOB: 5/23/65
SEX: MALE
HEIGHT: 5'10"
WEIGHT: 205
ALIAS(ES): BABYFACE; THE BARRISTER
SCARS/MARKINGS: RIVER CITY RIDERS TATTOO, BACK

CHARGE #1

ATTEMPTED MURDER

CHARGE DATE: 7/23/13
SEVERITY: FELONY
DISPOSITION: NOT GUILTY
CONVICTION: N/A
MAX SENTENCE: 15 YRS
SENTENCE: N/A

CHARGE #3

WELFARE FRAUD

CHARGE DATE: 3/2/14
SEVERITY: FELONY
DISPOSITION: DISMISSED
CONVICTION: N/A
MAX SENTENCE: 3 YRS
SENTENCE: N/A

CHARGE #2

PERJURY

CHARGE DATE: 5/13/14
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: 9/2/21
MAX SENTENCE: 3 YRS
SENTENCE: 1 YR

CHARGE #4

FELON WITH A FIREARM

CHARGE DATE: 9/22/15
SEVERITY: FELONY
DISPOSITION: GUILTY PLEA
CONVICTION: 11/22/15
MAX SENTENCE: 3 YRS
SENTENCE: 1YEAR



GOLD COUNTY LABORATORY OF FORENSIC SCIENCES

SUBJECT: AARON MILLER

VICTIM: JESSE SAUCEDO

DNA testing on the following items resulted in an unresolvable mixture. Jessie Saucedo, Leland Washington and Aaron Miller are all included as potential contributors to the DNA results obtained from the following:

- Swab of the possible bloodstain taken from the blade on the handsaw

DNA testing on the following item is consistent with the DNA profile of Jessie Saucedo:

- Swab of the possible bloodstain taken from the clear plastic dropcloth

This profile is expected to occur in approximately 1 in 565,000 individuals.

NOTE: Further testing could not be completed due to the unanticipated loss of power to the evidence storage freezer at the lab resulting in sample spoilage. It should also be noted that some minor evidence of contamination and DNA transfer were identified on the items prior to testing.

Dated: 6/19/23


Simone Leighty
Criminalist

LABORATORY OF FORENSIC SERVICES

This report contains the results and conclusions of the signing analyst.
Supporting examination documentation is maintained in the case file.

23FE187187
EXHIBIT 6



MISSING PERSONS REPORT

REPORTING PARTY: Brad Ng

INDIVIDUAL OF CONCERN: Jesse Saucedo

RELATIONSHIP: I have known Jesse since high school. We have been the best of friends ever since. We each returned to Gold County after college and seemed to pick right back up where we left off.

REASONS FOR CONCERN: Jesse hit and severely injured a couple in a DUI accident. He hasn't been able to forgive himself and has fallen into a deep depression. He quit going to work, he quit socializing and seemed to never leave his house. I have recently lost contact.

CONCERNS FOR THE INDIVIDUAL: I am so afraid that he may do something to himself or that I might lose him as a friend. He has been talking about how maybe things would be better if he could "start over" although I don't know what he meant by it.

DATE OF LAST CONTACT: 1/18/23 I was hoping to cheer him up. We made plans to meet up at Top Golf on 1/21/23 and hit some balls and have a few drinks. He never showed up and I never heard from him again. I have repeatedly tried to call him on every phone number I know of, and there has been no response. I have gone to his home several times and he either isn't home or he just won't answer.

ANY OTHER CONCERNS: Since he got out of jail he has seemed a bit paranoid. He seemed to be looking over his shoulder a lot and would make weird statements like "I think they're after me." I never saw anyone, but he just wouldn't let it go. Also, on the last day I saw him he gave me his prized football signed by Tom Brady. I get that Brady is washed up, but he meant a lot to Jesse.

LAW ENFORCEMENT ACTIONS TAKEN: Detective Stephenson conducted an investigation into Mr. Saucedo which revealed that as of 1/20/23 all activity on Mr. Saucedo's cell phone, credit cards and social media ceased. There has been no contact with family or friends and he has not returned to work or given notice to any of his clients.

23FE187187
EXHIBIT 7



PHOTO DATE
4/1/21

CRIMINAL RAP SHEET

SUBJECT NAME: MILLER, AARON
SSN: XXX-XX-2254
DOB: 1/3/68
SEX: MALE
HEIGHT: 6'2"
WEIGHT: 215
ALIAS(ES): PAPA-A; NITRO
SCARS/MARKINGS: RIVER CITY RIDERS TATTOO, LOW BACK

CHARGE #1
ASSAULT W/ DEADLY WEAPON
CHARGE DATE: 6/18/13
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: 9/9/13
MAX SENTENCE: 4 YRS
SENTENCE: 3 YRS

CHARGE #3
SOLICITATION OF PROSTITUTION
CHARGE DATE: 3/15/21
SEVERITY: MISDEMEANOR
DISPOSITION: PLEA
CONVICTION: 4/1/21
MAX SENTENCE: 1 YR
SENTENCE: 30 DAYS

CHARGE #2
DUI
CHARGE DATE: 1/1/20
SEVERITY: MISDEMEANOR
DISPOSITION: GUILTY
CONVICTION: 4/7/20
MAX SENTENCE: 1 YR
SENTENCE: 180 DAYS

CHARGE #4
BATTERY
CHARGE DATE: 8/4/20
SEVERITY: MISDEMEANOR
DISPOSITION: GUILTY PLEA
CONVICTION: 11/6/20
MAX SENTENCE: 1 YR
SENTENCE: 30 DAYS

1 People vs. AARON MILLER (Case No: 187187) DATE:1/20/23

2 911 CALL of TEAL ERICSON TIME:4:34PM

3 =====

4 OPERATOR: 911

5 GPD: Hi this is Gold PD with a transfer
6 (unintelligible) calling from 3679 44th
7 Street. She came home to a possible
8 burglary. Go ahead.

9 OPERATOR: Hi ma'am.

10 TEAL E. Yes. Hello?

11 OPERATOR: Hi so what is going on?

12 TEAL E. I'm not really sure. I think my dad's house
13 has been burglarized.

14 OPERATOR: Are you OK?

15 TEAL E. I'm scared. What if someone is still in
16 here?

17 OPERATOR: Can you take the phone and go outside?

18 TEAL E. Yes. Please just send someone to help!

19 OPERATOR: I have officers on the way. Just stay on the
20 line with me and tell me what happened?

21 TEAL E. I came over to check on my dad. He is having
22 a difficult time because of some things that
23 have happened recently and I was concerned
24 for him and wanted to check on him.

25

1 **People vs. AARON MILLER** (Case No: 187187)

2 911 CALL of TEAL ERICSON

3 =====

4 OPERATOR: And how is he now?

5 TEAL E. I have no idea. He's not here and I haven't
6 heard from him. I'm so scared for him. It
7 looks like there might even be some drops of
8 blood on the floor.

9 OPERATOR: Are you sure he's not there?

10 TEAL E. Yes. I was inside and the house was trashed.
11 He had clothes all over and bags pulled out.
12 He is normally a neat freak, so this is not
13 right.

14 OPERATOR: Is anything missing?

15 TEAL E. Let me look. It's hard to tell, but his safe
16 is open and it is empty.

17 OPERATOR: Is that normal?

18 TEAL E. No. He normally keeps his passport and cash
19 and valuables safely locked up!

20 TEAL E. Oh my god - I hear somebody outside! Oh,
21 it's just the police. Thank goodness!

22 OPERATOR: If you feel safe now, I'm going to hang up.

23 TEAL E. OK. Thank you!

24 **END OF CALL**

25



DJ_Sauce4



DJ_Sauce4 Back when life was good...

January 12, 2023

23FE187187
EXHIBIT 10



**GOLD COUNTY
HEALTH SYSTEMS**

Wife, Wife
MRN: 8224, DOB

(7/7/22) - Trauma Attending Note - Pt History and Discharge Diagnosis

Patient, Lauren Miller was admitted to ER after transported from car accident on May 6, 2022. Patient was unconscious on arrival with shallow breathing, abdominal swelling, and had no physical response to physical stimuli.

Suspected spinal cord injury confirmed by CT scan. Spinal Cord completely severed at C3, resulting in neck down paralysis. Brain activity is muted, but constant.

Patient was admitted for surgery to determine scope of internal injuries that caused abdominal swelling. Dr. Chisholm located and repaired lacerations on patient's liver and spleen. Patient admitted to ICU for stabilization.

On May 10, 2022 patient recovered consciousness, and appeared to recognize some family. Retna response to stimuli shows minimal improvement. Patient unable to form any words, but showing effort and eagerness to attempt.

On May 12, 2022 patient engaged in labored and very limited speech.

After two months in ICU, patient began manual physical therapy with occupational therapy team on all four limbs. No improvement in patient. Patient continues to have total loss of sensation and total loss of function. After consult with Neuro team, Patient unlikely to ever see significant function or sensation in limbs again. Mental status and speech has improved markedly. Patient able to swallow soft foods orally, but a feeding tube is still necessary to maintain calorie regiment.

Family has been connected to the Resource Center to set up providers for home care. Patient cleared for hospital discharge after arrangements have been confirmed. Patient is likely expected to require around the clock in-home hospice care for the remainder of her life.

*Matthew Chisholm, MD
Professor of Surgery
PI# 2215
Pager 874-1787
July 7, 2022*

Electronically signed by Chisholm, Matthew, MD at 7/7/22, 4:55pm

23FE187187
EXHIBIT 11

BANK OF GOLD

Bank Records for Acct # 359862095
Jesse Saucedo
Janaury 2023 Statement



Date	Description	Amount
1/1/2023	Punch Bowl - Bar	\$123.53
1/2/2023	Ella's Dinning Room and Bar	\$172.43
1/2/2023	McDonald's	\$24.61
1/3/2023	The Sawyer - Hotel and Bar	\$97.85
1/5/2023	Mas Taco	\$54.89
1/5/2023	Ten Ten - Cocktail Bar	\$44.24
1/6/2023	Southwest Airlines	\$874.56
1/7/2023	Safeway Grocery Store	\$204.11
1/7/2023	The Dive Bar	\$86.89
1/8/2023	The Grange Restaurant and Bar	\$104.32
1/9/2023	Travel and Leisure Magazine	\$10.99
1/9/2023	Revival Bar	\$92.32
1/10/2023	Frank Fat's Restaurant	\$105.22
1/12/2023	US GOV'T PSSPRT UPDT	\$110.00
1/13/2023	Taco Bell	\$12.50
1/13/2023	H-Dog's Liquor N Wine	\$35.53
1/14/2023	Safeway Grocery Store	\$153.45
1/15/2023	DoorDash	\$67.63
1/16/2023	DoorDash	\$78.90
1/16/2023	BevMo Online Order	\$234.56
1/17/2023	Luggage R Us	\$563.20
1/17/2023	DoorDash	\$47.82
1/18/2023	Chando's Tacos	\$23.42
1/19/2023	Sheraton Hotel - Deposit	\$334.20
1/20/2023	Cafeteria 15 L	\$52.41
1/20/2023	WITHDRAWAL	\$24,404.00
Remaining Balance		\$0.00

23FE187187

EXHIBIT 12

MISSING PERSON

HAVE YOU SEEN THIS PERSON?



JESSE SAUCEDO

AGE: 35 HEIGHT: 5'7" BROWN HAIR

**Last seen: CAFETERIA 15L
JANUARY 19, 2023 AROUND 1:00PM**

CALL 916-874-1787

23FE187187
EXHIBIT 13



23FE187187
EXHIBIT 14



GOLD COUNTY SHERIFF'S OFFICE

DA/COURT/LAW ENFORCEMENT HARDCOPY HARDCOPY

1
2
3
4
5
6 **5/6/22 (Friday)** I, Deputy Colin Stephenson #1 was assigned to the Gold County
7 Sheriff's Office North Patrol Division. I was wearing a full Sheriff's Office Uniform and
8 was driving a fully marked Patrol Vehicle.

9
10 0142 hours: I was dispatched to the intersection of Watt/Arden to assist with an injury
11 accident call. The text of the call read that fire was enroute to the location for a multiple
12 vehicle collision with one individual unresponsive in the passenger seat of a blue Honda
13 sedan. A light brown Toyota sedan was also on scene with heavy front end damage.

14
15
16 0145 hours: I arrived on scene and made contact with both drivers and turned them over
17 to other deputies who had arrived on scene. Fire was already on scene attempting to use
18 the jaws of life to extricate the injured female passenger from the Honda. I was able to
19 observe that she had severe lacerations to her face and scalp. All airbags had deployed
20 and her head and body were bent into unnatural positions. Paramedics were attempting
21 to stabilize her and had placed a collar around her neck. She was unconscious and it was
22 not immediately apparent whether or not she was breathing. Once she was extricated
23 from the car she was placed onto a stretcher and paramedics immediately began CPR.
24
25

1 The woman, later identified as Lauren Miller, was loaded into the awaiting ambulance
2 and taken to the hospital for emergency treatment.

3
4 0215 hours: A records check determined that the Honda was registered to one Aaron
5 Napoleon Miller with a residence at 1243 Fair Oaks Blvd. in Gold County. The Toyota
6 was registered to Jesse Sigmund Saucedo with a residence at 3679 44th Street in Gold
7 County. I observed that the intersection was equipped with operational traffic lights in
8 both directions. Traffic was heavy as local bars were just shutting down from Cinco de
9 Mayo parties. Witnesses on scene reported seeing a bright flash immediately prior to the
10 collision. A later check of the Red Light Camera System (RLCS) showed that a
11 photograph had been taken at the exact moment of the crash. I obtained a copy of the
12 photo and booked it into property. Additional data from the RLCS indicated that the light
13 was green for the Honda and had been red for the Toyota for approximately five seconds
14 before he entered the intersection. It is readily apparent that the Toyota ran the red light
15 and slammed directly into the passenger side of the Honda. EXHIBIT 1 is a copy of the
16 red light camera photograph that I collected.

17
18
19 0230 hours: I made contact with driver of the Toyota, Jesse Saucedo while still on scene.
20 He was bleeding from a scalp laceration on the side of his head. Wearing approved latex
21 gloves I rendered medical aid to treat the wound and stop the bleeding. As I was
22 assisting Mr. Saucedo I noted that his eyes were red and watery and he had a noticeable
23 smell of alcohol on his breath. He was crying and sobbed that "I am so sorry, this is all
24 my fault. I should never have taken those last couple of tequila shots." I then
25

1 administered him a series of field sobriety tests (FSTs). Mr. Saucedo was unable to
2 successfully complete any of the five tests that were administered to him. Saucedo was
3 unsteady on his feet, nearly falling over several times. His speech was slurred and he had
4 a significant lack of dexterity. I administered him a preliminary alcohol screening test
5 (PAS) and found him to have a Blood Alcohol Concentration (BAC) of .24.
6

7 Mr. Miller was leaning against my patrol car watching me administer the FSTs.
8 EXHIBIT 8 contains a photo of Mr. Miller along with other information. He became
9 noticeably more and more angry as each test was failed. Deputy Adrian McMillen noted
10 what was happening and stepped in front of Mr. Miller. She began to restrain him by
11 taking a grip on his right arm. Mr. Miller violently pulled away and began screaming
12 "You killed my wife you bastard! Now I'm gonna kill you!" It took multiple officers to
13 restrain Mr. Miller and he was placed into the back of a patrol car for both his safety and
14 that of Mr. Saucedo. Mr. Saucedo was arrested for Driving Under the Influence and
15 placed into the back seat of my patrol car. As I was documenting all parties
16 identification, Mr. Miller requested that I retrieve his wallet from his car. I searched the
17 wreckage of the Honda, but I was unable to locate the wallet.
18

19
20 Mr. Miller then recalled that his wallet may have been left in his tool belt in the back of
21 his work van. Needing to make a positive identification I drove to his home. Parked in
22 the driveway was a white windowless van. When I opened up the back of the van I noted
23 that it was chaotically organized. Tools and materials were strewn about the space. I
24 sorted through the items and located his wallet in a tool belt in a bucket of tools under a
25

1 clear plastic tarp and confirmed his identification. At that point I realized that I had
2 inadvertently worn the same gloves to search for the wallet that I was wearing at the
3 scene of the accident. After retrieving the wallet, I placed the gloves into a biohazard
4 container in the back of my patrol for safe destruction. I returned to the scene to transport
5 Mr. Saucedo for booking into the Gold County Jail. He was released a few hours later on
6 his own recognizance (OR) once he had sobered up. Exhibit 20 contains an accurate
7 photo of Mr. Saucedo among other pieces of information.
8

9 7/7/22 at 0900hrs: I was subpoenaed to testify at the preliminary hearing for Mr.
10 Saucedo. I ultimately did not testify as a plea agreement was reached wherein Mr.
11 Saucedo was placed on probation and only had to serve a period of 180 days in County
12 Jail and would receive good time credit which meant he could be released as soon as
13 10/20/22. As I exited the courtroom I ran into Mr. Miller. He was so angry about the
14 plea that he nearly had to be taken into custody. He tried to force his way back into the
15 courtroom yelling "If you guys won't do anything, I'll just have to do it myself. My wife
16 will never be the same and he gets to go back to his happy little life with a slap on the
17 wrist."
18

19
20 1/21/23 at 1105hrs: I received a call from Mr. Saucedo's probation officer, Danny Lee,
21 who was concerned that he was consuming alcohol in violation of the terms of his
22 probation. Therefore, I was tasked with installing an alcohol interlock device onto Mr.
23 Saucedo's vehicle. I left several messages for Mr. Saucedo to arrange for the installation.
24 All messages went unreturned and all future calls went straight to voicemail. His
25

1 conditional release paperwork identified a Ms. Ashley Pane as his emergency contact and
2 provided her contact information. Ms. Pane did not answer any of my calls or return any
3 messages left for her. I attempted to locate her at her place of business, The Goldtown
4 Modeling Agency where she works under the name of AshleyP. Her agent informed me
5 that she had taken an assignment out of the country and did not know when or if she
6 would be returning.

7
8 1545hrs: I resumed my normal duties and began to patrol my new beat, in the Fabulous
9 Forties neighborhood. Just a few minutes into my patrol I noticed a familiar looking
10 white van that seemed out of place in the neighborhood. It was being driven by a large
11 African American male who I had never seen in that location before. He was clearly up to
12 no good, so I determined that I should investigate and circled around to pull in behind the
13 van. As I finished my turn I saw the van speed away. When the van exceeded the speed
14 limit and ran multiple red lights and stop signs I turned on my lights and sirens and gave
15 pursuit. The chase lasted several minutes and exceeded a distance of 2-3 miles. The van
16 made an abrupt left hand turn and lost control. It slid off the street and into the trunk of
17 an old oak tree.
18

19
20 The door flew open, and the man, who was wearing a black vest, ran from the vehicle. I
21 pursued him for about 100 yards before he tripped and fell face down in the dirt. I could
22 see that his black vest had the logo of the River City Riders on the back, a local gang I
23 knew from personal experience for drug trafficking, physical violence and a complete
24 disregard for the law. EXHIBIT 2 is a depiction of the gang logo and EXHIBIT 5
25

1 contains a photo of Mr. Washington along with other information. I placed him into
2 handcuffs for my own personal safety and returned him to the scene where he was held in
3 the back of my patrol car. He was subsequently confirmed to be Leland Washington. As
4 I approached the van, Mr. Washington began to yell out the window "That shit ain't
5 mine! I had nothing to do with this! It's all on Miller man!" I placed a call to dispatch
6 to check Mr. Washington's history and took look for possible warrants. He was clear for
7 warrants and dispatch confirmed that Mr. Washington's history included both crimes of
8 violence and weapons. He was clearly nervous about something because he kept yelling
9 something about him being off parole and I had no right to search the van.
10

11 I looked into the driver's compartment where I could see in plain view an empty handgun
12 holster on the passenger seat. I continued to search the remainder of the van and located
13 a loaded semiautomatic handgun and a small baggie containing methamphetamine under
14 the passenger seat. Upon opening up the rear compartment of the van I was immediately
15 hit by the smell of bleach. The area was now organized and reasonably clean. However,
16 my attention was drawn to the large bucket that contained a variety of cutting tools and
17 tarp that had been in the van on the night I retrieved Mr. Miller's wallet. Just a few feet
18 away was roll of duct tape sitting by a box of unused zip ties. Upon closer inspection I
19 noted several red specks on the saw a red smudge on the tarp. CSI was called to
20 photograph and process the scene. EXHIBIT 14 is a photo of the items I found.
21 EXHIBIT 15 is a photo of the saw where I noted the possible specks of blood and
22 EXHIBIT 17 is a close-up view of the specks. The specks were swabbed and sent to the
23 lab for processing. Despite having the appearance of recently being cleaned, I noted a
24
25

1 dark smudge in a crease of the tarp. EXHIBIT 18 is a photo of the tarp and EXHIBIT 21
2 is a closeup view of the red substance on the tarp. The smudge was swabbed and sent to
3 the lab for processing. I collected the tools and tarp to be booked as evidence. I thought
4 I had locked them in my trunk for safe keeping. I got busy with several other calls for
5 service and didn't get to the property room for several days. When I finally opened my
6 trunk to book the evidence, it was gone. I have no idea what happened to it.

7
8 **End of Report**

9
10
11
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17
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21
22
23
24
25



23FE187187
EXHIBIT 17



23FE187187
EXHIBIT 18



PHOTO DATE
4/1/21

CRIMINAL RAP SHEET

SUBJECT NAME: HILL, KEITH
SSN: XXX-XX-2254
DOB: 6/16/68
SEX: MALE
HEIGHT: 6'1"
WEIGHT: 235
ALIAS(ES): THE HAMMER
SCARS/MARKINGS: RIVER CITY RIDERS TATTOO, CHEST

CHARGE #1

ASSAULT W/ DEADLY WEAPON

CHARGE DATE: 1/18/12
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: 9/9/12
MAX SENTENCE: 4 YRS
SENTENCE: 4 YRS

CHARGE #3

CRIMINAL THREATS

CHARGE DATE: 1/15/21
SEVERITY: FELONY
DISPOSITION: GUILTY PLEA
CONVICTION: 6/1/21
MAX SENTENCE: 3 YR
SENTENCE: 180 DAYS

CHARGE #2

ROBBERY

CHARGE DATE: 4/1/20
SEVERITY: FELONY
DISPOSITION: ACQUITED
CONVICTION: 4/7/20
MAX SENTENCE: 5 YRS
SENTENCE: N/A

CHARGE #4

CARJACKING

CHARGE DATE: 8/4/17
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: 11/6/16
MAX SENTENCE: 9 YRS
SENTENCE: 3 YRS



CRIMINAL RAP SHEET



PHOTO DATE
5/6/22

SUBJECT NAME: SAUCEDO, JESSE
SSN: XXX-XX-3243
DOB: 7/22/71
SEX: MALE
HEIGHT: 5'8"
WEIGHT: 155
ALIAS(ES): N/A
SCARS/MARKINGS: BABY'S FOOTPRINTS, R CALF

CHARGE #1

DUI WITH INJURY

CHARGE DATE: 5/6/22
SEVERITY: FELONY
DISPOSITION: PLEA
CONVICTION: 7/7/22
MAX SENTENCE: 3 YRS
SENTENCE: 180 days

23FE187187
EXHIBIT 20



23FE187187
EXHIBIT 21

1 THIENVU HO
District Attorney
2 901 G Street
Gold City, CA 95814-1858
3 Telephone (916) 874-5678

4 Attorneys for Prosecution

5 SUPERIOR COURT OF CALIFORNIA,
6 COUNTY OF GOLD
7

8 THE PEOPLE OF THE STATE OF CALIFORNIA,)
9 Plaintiff,)
10 vs.)
11 AARON MILLER)
12 Defendant)
13

Case No. 23FE187187
JURY INSTRUCTIONS

14 The Court shall (constructively) read these instructions to the jury before closing arguments:

15 **Introduction**

- 16
- 17 1. Members of the jury, the case has been submitted to you, and I will now instruct you as to
18 the law before you hear the parties closing arguments. The law that applies to this case is
19 stated in these instructions, and it is your duty to follow all of them. It is your duty to
20 determine the facts and to determine them only from the evidence in this case. You are to
apply the law to the facts. Neither sympathy nor prejudice should influence you or your
verdict.

21 **Evidence**

- 22 2. From time to time it has been the duty of the court to rule on the admissibility of
23 evidence. Any evidence that was received for a limited purpose should not be considered
24 by you for any other purpose than that stated by the court. You should disregard
testimony and exhibits which the court has refused or stricken.
- 25 3. The evidence consists only of the testimony of the witnesses and the exhibits which the
26 court has received.
- 27 4. Neither opening statements nor closing arguments are evidence, and any statement or
28 argument made by the attorneys which is not based on the evidence should be
disregarded.

- 1 5. You should consider all evidence in the light of your own observations and experience in
2 life.
- 3 6. The evidence may be either direct or circumstantial evidence. Direct evidence is
4 testimony about what a witness personally saw heard or did. Circumstantial evidence is
5 testimony about one or more facts that logically lead you to believe the truth of another
6 fact. You should consider both direct and circumstantial evidence in reaching your
7 verdict. You may decide the facts in this case based upon circumstantial evidence alone.

8 **Charges, Burden and Elements**

- 9 7. The government has charged the defendant with a single count of premeditated murder.
- 10 8. The defendant is presumed to be innocent of the charges. This presumption remains with
11 the defendant throughout every stage of the trial and during your deliberations on the
12 verdict; It is not overcome unless from all the evidence you are convinced beyond a
13 reasonable doubt that the defendant is guilty. The government has the burden of proving
14 that the defendant is guilty of the charges, and this burden remains on the government
15 throughout the case. The defendant is not required to prove the defendant's innocence.
- 16 9. "Proof beyond a reasonable doubt" does not require proof beyond all doubt, as such
17 certainty is not possible with human affairs. Instead, proof beyond a reasonable doubt
18 requires a moral certainty that leaves one without hesitation to act.
- 19 10. For you to find the Defendant guilty of murder, the Government must prove each of
20 these elements beyond a reasonable doubt: (1) the Defendant caused the death of Jesse
21 Saucedo (2) with malice aforethought.
- 22 11. To kill with "malice aforethought" means either to kill another person deliberately and
23 intentionally, or to act with callous and wanton disregard for human life. To find malice
24 aforethought, you need not be convinced that the defendant hated the person killed or felt
25 ill will toward the victim at the time.
- 26 12. The government proves causation either if the defendant personally killed Saucedo or if
27 the defendant engaged, ordered, or otherwise caused another person to kill Saucedo.
- 28 13. The prosecution is not required to prove that the defendant had a motive to commit the
crime. In reaching your verdict you may, however, consider whether the defendant had a
motive. Having a motive may be a factor tending to show that the defendant is guilty. Not
having a motive may be a factor tending to show the defendant is not guilty.

1 THIENVU HO
District Attorney
2 901 G Street
Gold City, CA 95814-1858
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4 Attorneys for Prosecution

5 SUPERIOR COURT OF CALIFORNIA,
6 COUNTY OF GOLD

8 THE PEOPLE OF THE STATE OF CALIFORNIA,)

Case No. 23FE187187

9 Plaintiff,)

10 vs.)

VERDICT FORM

11 AARON MILLER)

12 Defendant)

13 _____)
14
15 **COUNT 1 – MURDER**

16 As to the crime of the First Degree Murder of JESSE SAUCEDO as charged in Count 1 of the
17 Information, we the Jury in the above-entitled cause, find the Defendant, AARON MILLER to be
18 **GUILTY.**

19
20 Having found the defendant, Aaron Miller **GUILTY** of the crime of First Degree Murder, we the
21 jury further find the allegation that the murder was committed willfully with premeditation and
22 deliberation to be:

23 True _____

Not True _____

24
25
26
27 Dated: _____

Jury Foreperson

1 THIENVU HO
District Attorney
2 901 G Street
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5 SUPERIOR COURT OF CALIFORNIA,
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7

8 THE PEOPLE OF THE STATE OF CALIFORNIA,)
9 Plaintiff,)

Case No. 23FE187187

10 vs.)

VERDICT FORM

11 AARON MILLER)

12 Defendant)
13

14
15 **COUNT 1 – MURDER**

16 As to the crime of the First Degree Murder of JESSE SAUCEDO as charged in Count 1 of the
17 Information, we the Jury in the above-entitled cause, find the Defendant, AARON MILLER to be **NOT**
18 **GUILTY.**
19
20
21
22
23
24
25

26 Dated: _____

27 _____
Jury Foreperson
28