

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

**SUPERIOR COURT
NO. 2014SUCR10417
NO. 2015SUCR10384**

COMMONWEALTH

V.

AARON HERNANEZ

AMENDED DEFENDANT'S LIST OF POTENTIAL WITNESSES

Now comes the Defendant in the above-captioned matters and, with respect to potential witnesses or names that may be mentioned at trial, respectfully states as follows:

1. Richard Eiklenboom. and Selma Eiklenboom are expert's in DNA and Crime Scene reconstruction. With respect to DNA evidence they will testify they sampled 12 locations from the alleged firearm used in the Boston shooting. They identified numerous mixed DNA samples and compared the samples against the DNA profile of the Defendant. The Defendant's DNA did not match any of the mixed profiles obtained from the alleged firearm.
2. Thomas Martin, Crime Scene expert - Former Senior Investigator for the New York State Police for 22 years, who has processed thousands of crime scenes will testify as to proper procedures at homicide scenes concerning preservation of the scenes and evidence and the importance of same. That his normal operating procedure was to maintain all evidence collected during a homicide investigation, including motor vehicles in which victims were killed, until the adjudication of the case.
3. Dr. Jaime Downs. Forensic Pathologist who will be discussing ME jurisdiction and preservation of evidence related to human bodies at scenes, appropriate ME scene procedures and rationale for same; Autopsy procedure & evidence collection, documentation, & preservation and the rationale for same; Cause & Manner of death; The nature of gunshot wounds, to include but not limited to entry wounds, exit wounds, fragmentation, atypical entry wounds, range of fire, trajectory, relative position, the use of bullet fragments to determine trajectory, distance and angle of gunfire based on wound circumstances and patterns; Responsive to any opinions of Dr. Lindstrom or any other state's expert who testifies in areas relating to the expertise of Forensic Pathology; Wound interpretation of decedents as it relates to the surrounding evidence including the

BMW; and the wound of passenger Freire; and That the evidence is consistent with 6 shots being fired.

4. Jake Green Digital Forensics. Forensics expert who will testify regarding material obtained from his forensic examination of Bradley's iPhone and Hernandez's blackberry.
5. Unknown Expert to discuss marijuana use in the NFL.
6. Unknown Expert to discuss the medical and psychological impacts for individuals who ingest marijuana and any relationship between such behavior and violence.
7. Unknown Witness to discuss athletes and their security concerns.
8. Unknown Expert to discuss issues and concerns regarding expert witness identification.
9. Stuart James, Expert on blood pattern analysis. (See previously submitted report)

Civilian Witnesses

10. Lysander Amado.
11. AT&T records custodian.
12. Jerimiah Lyons Private Investigator who swabbed Jailine Diaz Ramos.
13. Jamar Durham Bradley Associate.
14. Warren McMaster
15. Toyota Representative
16. Tufts Medical Center Emergency Nurse
17. Ahmed M. Elhaddad, M.D. St Mary's Medical Center West Palm Beach

The defense is attempting to speak with other potential witnesses and reserves the right to add them later.

OTHER WITNESSES

CIVILIANS

- 1) Auriza Abreu-Mett, Brockton, MA
- 2) Eliseu Abreu, Boston, MA
- 3) Neusa Abreu, Boston, MA
- 4) Paige Aiello, Medford, MA
- 5) John Alcorn, Lauderdale Lakes, FL
- 6) Kevin Anderson, Foxboro, MA
- 7) Christopher Antoine, Holbrook, MA
- 8) Tracy Atherton, Irvine, CA
- 9) Reuben Battles, Brockton, MA
- 10) Brandon Beam, Bristol, CT
- 11) William Belichick, Hingham, MA
- 12) Mingle Blake, West Palm Beach, FL
- 13) Alexander Bradley, Bristol, CT

- 14) Daquan Brooks, Bristol, CT
- 15) Max Brown, Laurel, MD
- 16) Steve Burton, Boston, MA
- 17) Maurice Bynes, South Bay, FL
- 18) Jason Cai, Quincy, MA
- 19) Daniel Callanan, Norwood, MA
- 20) Seneque Capre, Randolph, MA
- 21) Terry Chan, Quincy, MA
- 22) Brandon Chase, Auburndale, MA
- 23) Jaymine Cheng, Hermosa Beach, CA
- 24) Tyrone Crawford, Belle Glade, FL
- 25) Marlene De Sousa, Milford, MA
- 26) Gabriel Diaz, Medford, MA
- 27) Luz Diaz, Bristol, CT
- 28) Jailene Diaz Ramos, Bristol, CT
- 29) Cleon Earle, Glen Oaks, NY
- 30) Matthew Falconer, Charlestown, MA
- 31) Jose Fernandes, Dorchester, MA
- 32) Jack Fox, Providence, RI
- 33) Dules Frederick, Randolph, MA
- 34) Aquilino Freire, Dorchester, MA
- 35) Jamie Furtado, Fall River, MA
- 36) Maria Texiera-Furtado, Dorchester, MA
- 37) Safira Furtado, Boston, MA
- 38) Thomas Gargas, (Tootsie's Manager) Miami Gardens, FL
- 39) Michael Gasperic, (Tootsie's Manager) Miami Gardens, FL
- 40) Donald Gobin, Providence, RI
- 41) Raychides Gomes-Sanches, Fall River, MA
- 42) Kevin Gordon, Hartford, CT
- 43) Kyle Green, Costa Mesa, CA
- 44) Sherif Hashem, Boston, MA
- 45) Dennis Johnathan Hernandez, Hartford, CT
- 46) Oscar Hernandez, Belle Glade, FL
- 47) Terry Hernandez, Bristol, CT
- 48) Jeffrey Hsu, Quincy, MA
- 49) Raven Hwang, Boston, MA
- 50) Gion Jackson, Belle Glade, FL
- 51) Kyle James, Los Angeles, CA
- 52) Shayanna Jenkins, Providence, RI
- 53) Aisha Jones, Wethersfield, CT
- 54) James Joseph, Belle Glade, FL
- 55) Kelley Kay, Bristol, CT
- 56) Richard King, Arlington, MA
- 57) Zarina Kiriakides, Miami, FL
- 58) Edward Leahy, Waltham, MA
- 59) Robert Lindsey, Hartford, CT

- 60) Jeffrey London, Boston, MA
- 61) Gerson Lopes, Roxbury, MA
- 62) Robert Lunetta, East Boston, MA
- 63) Justin Lydem, Bristol, CT
- 64) Austin Lyman, Newport Beach, CA
- 65) Cormac McBride, Stoneham, MA
- 66) Sean McCann, Somerville, MA
- 67) Josh McDaniels, Attleboro, MA
- 68) Ryan McDonnell, Bristol, CT
- 69) Erskine McKinley, Belle Glade, FL
- 70) Warren McMaster, Hanson, MA
- 71) Pernell McPhee, Owings Mills, MD
- 72) Yesenia Mejia, Springfield, MA
- 73) Christian Moreta, Dorchester, MA
- 74) Brian Murphy, Newport Beach, CA
- 75) Zeid Nabulsi, Framingham, MA
- 76) David Nelson, Hermosa Beach, CA
- 77) Jose Nunez, Springfield, MA
- 78) Ugochukwu Ojimba, South Boston, MA
- 79) Roberto Olivares, Central Falls, RI
- 80) Carlos Ortiz, Bristol, CT
- 81) Marissa Pagan, Avondale, AZ
- 82) Robert Paradis, Bristol, CT
- 83) Frank Perotta, Rumford, RI
- 84) Christopher Petrie, Pompano Beach, FL
- 85) Sophie Phon, Reading, MA
- 86) Je'rrelle Pierre, Royal Palm Beach, FL
- 87) David Pilkovic, Middletown, RI
- 88) Jennifer "Gina" Mercado, Bristol, CT
- 89) James Michael Pouncey, Davie, FL
- 90) Maurkice Pouncey, Wexford, PA
- 91) Marilia Prinholato, Marlborough, MA
- 92) Brian Quon, Providence, RI
- 93) Daniella Rajic, New York NY
- 94) Marilyn Ramos, Bristol, CT
- 95) Kevin Riddle, Riviera Beach, FL
- 96) Darrell Roberts, Belle Glade, FL
- 97) James Rogash, Norton, MA
- 98) Brian Saintilus, Arlington, MA
- 99) Tony Salvador, Somerville, MA
- 100) George Sarkis, Jr., Dedham, MA
- 101) Brian Schmitt, North Andover, MA
- 102) Franklin Sejour, Belle Glade, FL
- 103) Grazielli Silva, Milford, MA
- 104) Antwan Singleton, Bristol, CT
- 105) Vanessa Smith, Bristol, CT

- 106) William Sylvester, Dedham, MA
- 107) Miller Thomas, Boston, MA
- 108) Deonte Thompson, Lakeshore, IL
- 109) Somia Tadjer, Saugus, MA
- 110) Andy Tirado, Durham, CT
- 111) Jonathan Torres, Bristol, CT
- 112) Thanh Tran, Revere, MA
- 113) Andres Valderrama, Bristol, CT
- 114) Jason Visocchi, Franklin, MA
- 115) Steve Vujevich, Columbus, OH
- 116) Savannah Wall, Aliso Viejo, CA
- 117) Andrew Wallace, Dorchester, MA
- 118) Ernest Wallace, Bristol, CT
- 119) Thomas Welby, Middletown, RI
- 120) Brooke Wilcox, Bristol, CT
- 121) Kelly Whiteside, Montclair, NJ
- 122) Renee Whitney, Farmville, NC

BOSTON POLICE DEPARTMENT

- 1) Sergeant Detective Brian Albert, Boston Police Department
- 2) Officer George Beaulieu, Boston Police Department
- 3) Officer Edward Boudreau, Boston Police Department
- 4) Detective Arthur Hall Brewster, Boston Police Department
- 5) Officer Matthew Carey, Boston Police Department
- 6) Officer James Carnes, Boston Police Department
- 7) Officer Peter Cazeau, Boston Police Department
- 8) Detective Gary Chin, Boston Police Department
- 9) Officer Luciano Cirino Ayuso, Boston Police Department
- 10) Officer Andrew Crosby, Boston Police Department
- 11) Officer Jenna Cullity, Boston Police Department
- 12) Detective Joshua Cummings, Boston Police Department
- 13) Officer Winston DeLeon, Boston Police Department
- 14) Lieutenant Detective Paul Donovan, Boston Police Department
- 15) Sergeant Detective Daniel Duff, Boston Police Department
- 16) Sergeant Susan Edghill-Yard, Boston Police Department
- 17) Officer Michael Griffin (retired), Boston Police Department
- 18) Officer Erick James, Boston Police Department
- 19) Officer Philip Kearney, Boston Police Department
- 20) Officer Kelvin Kervin, Boston Police Department
- 21) Detective Joseph King, Boston Police Department
- 22) Sergeant Martin Kraft, Boston Police Department
- 23) Officer Roger Layden, Boston Police Department
- 24) Sergeant Detective Richard Lewis, Boston Police Department
- 25) Officer Jeffrey Lynch, Boston Police Department
- 26) Detective Paul MacIsaac, Boston Police Department

- 27) Officer David Malcolm, Boston Police Department
- 28) Officer Christopher McCarthy, Boston Police Department
- 29) Sergeant Sean McCarthy, Boston Police Department
- 30) Detective Thomas McDonough, Boston Police Department
- 31) Sergeant Clifton McHale, Boston Police Department
- 32) Detective David Munroe (retired), Boston Police Department
- 33) Officer Thomas O'Donnell, Boston Police Department
- 34) Officer Michael Pankievich, Boston Police Department
- 35) Officer Roberto Paulino, Boston Police Department
- 36) Officer Sean Rooney, Boston Police Department
- 37) Officer Rene Sanchez, Boston Police Department
- 38) Sergeant Detective Michael Stratton, Boston Police Department
- 39) Sergeant Detective Marc Sullivan, Boston Police Department
- 40) Sergeant Detective Michael Talbot, Boston Police Department
- 41) Officer George White, Boston Police Department
- 42) Detective Anthony Williams, Boston Police Department

MASSACHUSETTS STATE POLICE

- 1) Trooper Paul Aten, Massachusetts State Police
- 2) Trooper Michael Bates, Massachusetts State Police
- 3) Trooper Eric Benson, Massachusetts State Police
- 4) Trooper Michael Cherven, Massachusetts State Police
- 5) Trooper Joseph Collins, Massachusetts State Police
- 6) Trooper Derek Cormier, Massachusetts State Police
- 7) Trooper Jeremiah Donovan, Massachusetts State Police
- 8) Trooper Dan Iossi, Massachusetts State Police
- 9) Lieutenant Michael King, Massachusetts State Police
- 10) Trooper Michael Lombard, Massachusetts State Police
- 11) Trooper Orlando Medina, Massachusetts State Police
- 12) Deborah Miller, Massachusetts State Police
- 13) Trooper Thomas Murphy, Massachusetts State Police
- 14) Trooper Jamie Silvia, Massachusetts State Police
- 15) Trooper Joshua Winters, Massachusetts State Police

OTHER LAW ENFORCEMENT AGENCIES

- 1) Detective Peter Dauphanis, Bristol Police Department
- 2) Detective Garrie Dorman, Bristol Police Department
- 3) Lieutenant Kevin Morrell, Bristol Police Department
- 4) Officer Daniel Perkins, Bristol Police Department

- 5) Special Agent Michael Grasso, Bureau of Alcohol, Tobacco, Firearms and Explosives

- 6) Special Agent Vince Holmes, Bureau of Alcohol, Tobacco, Firearms and Explosives
- 7) Officer Wayne Lewis, Hermosa Beach Police Department
- 8) Officer Todd Lewitt, Hermosa Beach Police Department
- 9) Detective Joseph Leary, Massachusetts Transit Police
- 10) Kathleen Callahan, Massachusetts Probation Department, Quincy, MA
- 11) Officer Michael Elliot, North Attleboro Police Department
- 12) Officer Richard McKeon, North Attleboro Police Department
- 13) Deputy Israel Baez, Palm Beach County Sheriff's Office
- 14) Deputy John Burman, Palm Beach County Sheriff's Office
- 15) Deputy Mack Davis, Palm Beach County Sheriff's Office
- 16) Deputy Vancil Garner, Palm Beach County Sheriff's Office
- 17) Detective Christopher Farron, Palm Beach County Sheriff's Office
- 18) Omar Felix, Palm Beach County Sheriff's Office
- 19) Elizabeth Lancaster, Palm Beach County Sheriff's Office
- 20) Deputy Keith Ostien, Palm Beach County Sheriff's Office
- 21) Detective Kenneth Smith, Palm Beach County Sheriff's Office
- 22) Angela Weissman, Palm Beach County Sheriff's Office
- 23) Assistant State's Attorney Vicki Melchiorre, State's Attorney Office of Connecticut
- 24) Robert Pickering, Attorney
- 25) Robert Settana, Investigator, Suffolk County District Attorney's Office
- 26) Assistant District Attorney Edmond Zabin, Suffolk County District Attorney's Office
- 27) Andrew Caron, Tufts Security
- 28) Robert Devlin, Tufts Security
- 29) Raymond Jean, Tufts Security
- 30) Joshua Lopes, Tufts Security
- 31) Daniel Minihan, Tufts Security
- 32) Noah Wade, Tufts Security

MEDICAL PERSONNEL/FORENSIC AND CRIME LAB

- 1) Superintendent Michael Bosse, Boston EMS
- 2) Paramedic David Cioffi, Boston EMS
- 3) Lt. William Lessard, Boston EMS
- 4) Paramedic Sean Murphy, Boston EMS

- 5) EMT Todd Ritch, Boston EMS
- 6) Kevin Kosiorek, Boston Police Crime Laboratory
- 7) Julie Lynch, Boston Police Crime Laboratory
- 8) Amy Reynolds, Boston Police Crime Laboratory
- 9) Emily Ross, Boston Police Crime Laboratory
- 10) Joseph Ross, Boston Police Crime Laboratory
- 11) Eric Savike, Boston Police Crime Laboratory
- 12) Deborah Dobrydney Kosiorek, Boston Police Latent Print Unit
- 13) Kristen Tolan, Boston Police Latent Print Unit
- 14) Detective Tyrone Camper, Boston Police Department – Firearms Analysis Unit
- 15) Sergeant Martin Lydon, Boston Police Department – Firearms Analysis Unit
- 16) John Biello, Massachusetts State Police
- 17) Steven Lord, Massachusetts State Police
- 18) Dr. Katherine Lindstrom, Office of the Chief Medical Examiner
- 19) Donna Cabral, RN, St. Mary’s Hospital, FL
- 20) Dr. Ahmed Elhadad, St. Mary’s Hospital, FL
- 21) Dr. Matthew Mostofi, Tufts New England Medical Center

OTHER EXPERT WITNESSES

- 1) John Green, Suffolk County District Attorney’s Office
- 2) Gregory Guillette, Gladiator Forensics
- 3) Michael Haag, Forensic Science Consultants, LLC, Albuquerque, NM
- 4) Special Agent Mattheu Kelsch, Bureau of Alcohol, Tobacco, Firearms and Explosives
- 5) Detective Timothy Laham, Boston Police Department
- 6) Ricardo Leal, Sprint
- 7) Christopher Ritchell, AT&T
- 8) Deputy Special Agent Anthony Visalli, United State Marshals
- 9) Sergeant Detective Kevin Witherspoon, Boston Police Department

KEEPER OF THE RECORDS

- 1) AT&T, Keeper of the Records
- 2) Bank of America, Keeper of Records
- 3) Boston Police Department Turret, Keeper of the Records
- 4) Bristol County Sheriff’s Office, Keeper of the Records
- 5) Enterprise Rent-a-Car, Keeper of the Records
- 6) Financial Institute of America-Credit Services, Keeper of Records

- 7) Florida Department of Corrections, Keeper of the Records
- 8) Jet Blue Airlines, Keeper of the Records
- 9) LaQuinta Inns & Suites, Keeper of the Records
- 10) Luxe Travel, Keeper of the Records
- 11) Massachusetts Department of Corrections, Keeper of the Records
- 12) Merrill Lynch Bank of America Corporation, Keeper of Records
- 13) Metro PCS, Keeper of the Records
- 14) New England Patriots, Keeper of the Records
- 15) Palm Beach County Sheriff's Office, Keeper of the Records
- 16) Smith & Wesson, Keeper of the Records/Historian, Roy Jenks
- 17) SpringHill Suites, Keeper of the Records
- 18) Sprint, Keeper of the Records
- 19) Suffolk County Sheriff's Office, Keeper of the Records
- 20) T-Mobile, Keeper of the Records
- 21) Tootsie's Cabaret, Keeper of the Records
- 22) United Airlines, Keeper of the Records
- 23) Verizon Wireless, Keeper of the Records

Respectfully Submitted
on behalf of Aaron Hernandez,
by his attorneys,



Ronald S. Sullivan, Jr., Esq.
DC Bar #45158
32 Mill Street
Cambridge, MA 02138
(617) 496-4777



Jose Baez, Esq.
The Baez Law Firm
FL Bar #0013232
40 SW 13th Street, Suite 505
Miami, FL 33130
(305) 999-5100



George J. Leontire, Esq.
BBO No. 294270
Leontire & Associates, P.C.
32 William Street
New Bedford, MA 02740
(508)-993-0333

Linda Kenney Baden, Esq.
NY Bar #389330
Law Office of Linda Kenney Baden
15 West 53rd Street, Suite 18
New York, NY 10019
(732) 219-7770

Robert E. Proctor, Esq.
BBO No. 649155
6 Everett Street, Suite 5116
Cambridge, MA 02138
(617) 496-8144

Alex Spiro, Esq.
NY Bar #4656542
Brafman & Assoc., P.C.
767 3rd Avenue, 26th Fl.
New York, NY 10017
(212) 750-7800

Dated: February 14, 2017

CERTIFICATE OF SERVICE

I hereby certify this 17^h day of February 2017 that a true copy of the within *Defendant's Witness List* was sent via email to all counsel of record as follows:

Patrick M. Haggan, Esq.
Teresa K. Anderson, Esq.
Mark Lee, Esq.
One Bulfinch Place
Boston, MA 02114



George J. Leontire, Esq.