



Syracuse University

College of Law

Syracuse National Trial Competition

**UNITED STATES OF AMERICA**

**v.**

**JEFF JOSEPH**

**EXHIBITS**

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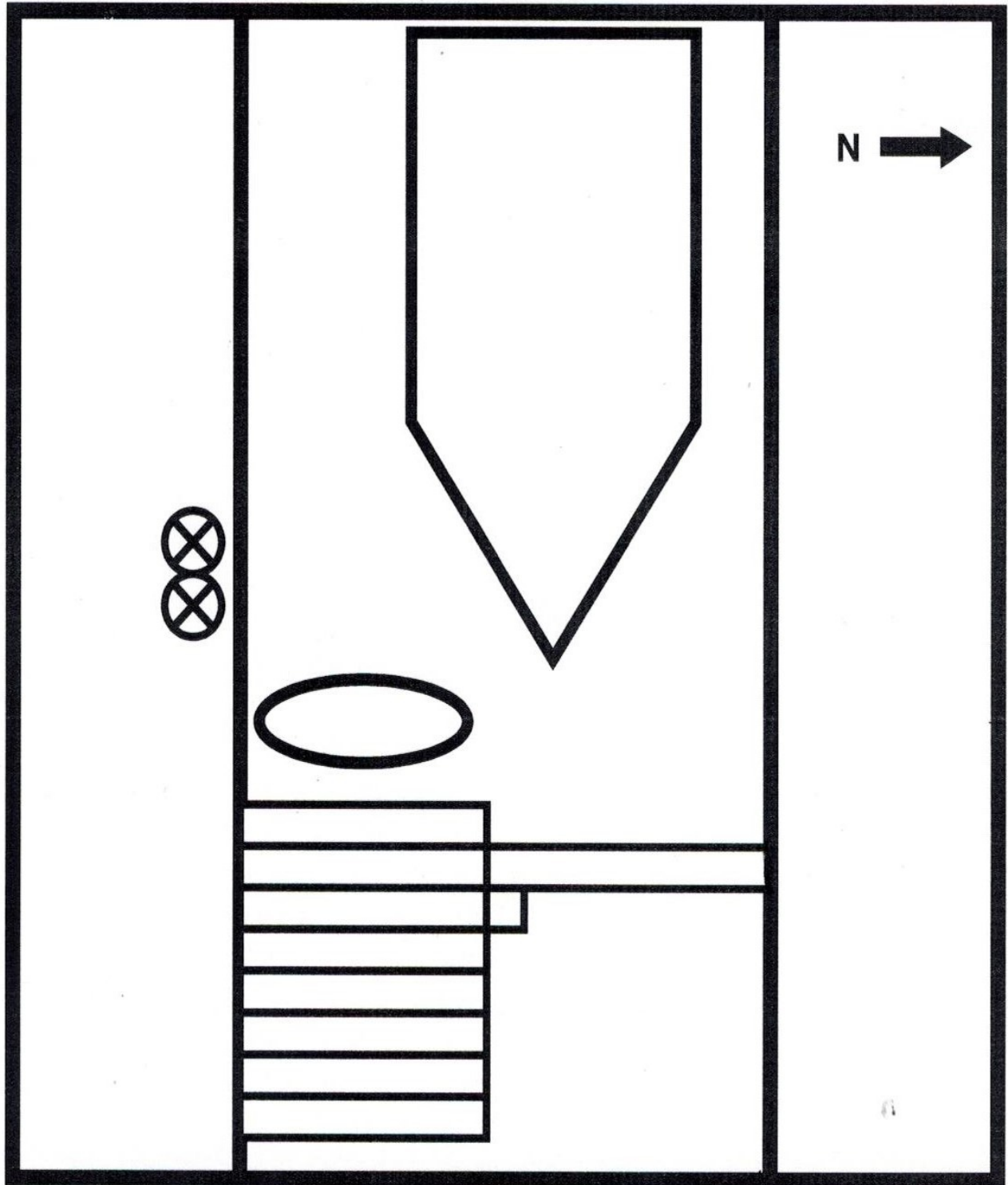
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# EXHIBIT 1



EXHIBIT 2





### EXHIBIT 3

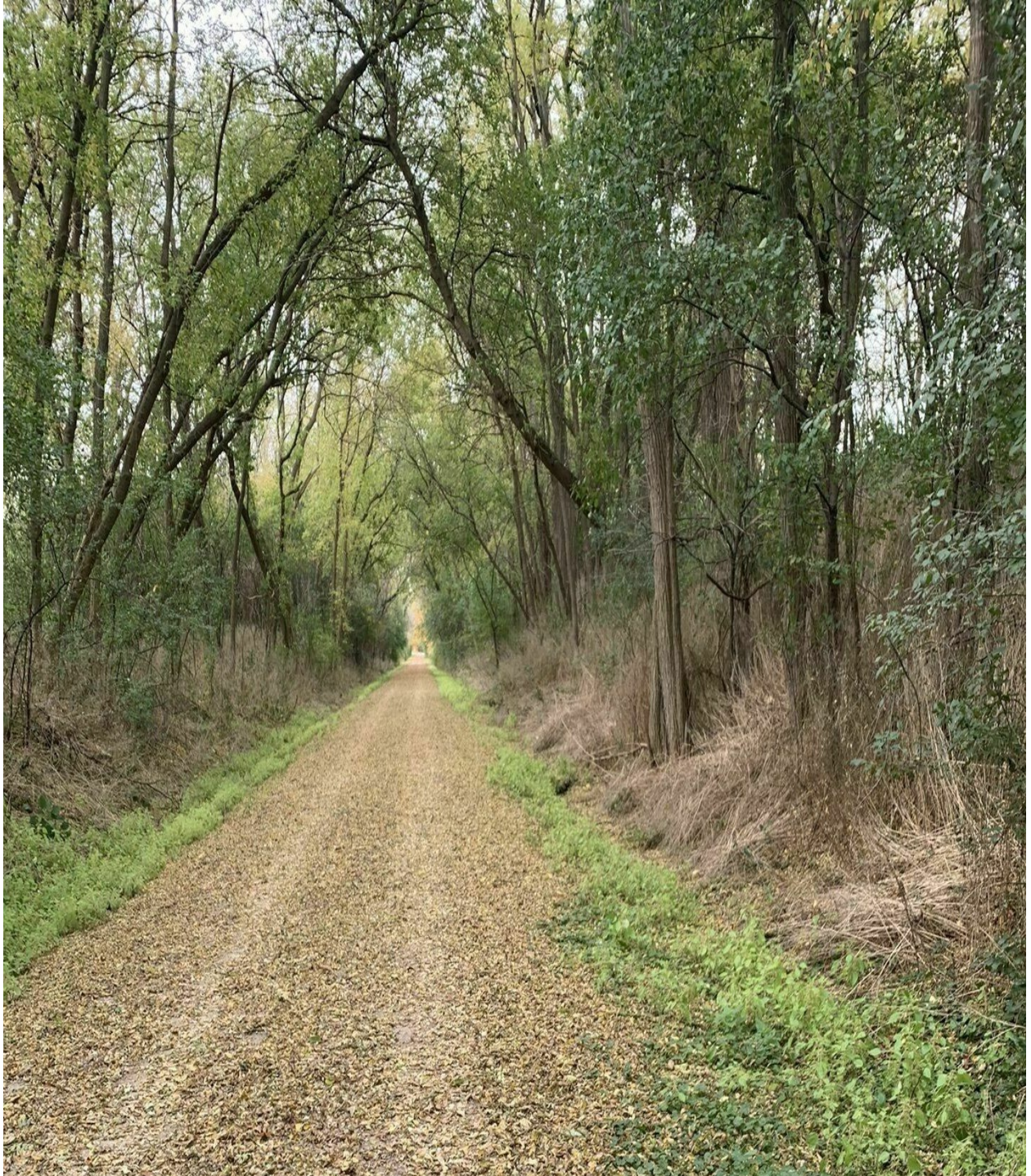


EXHIBIT 4





EXHIBIT 5



EXHIBIT 6




EXHIBIT 7




# EXHIBIT 8

The following is a true, complete and accurate transcription of all text messages sent by Marnie Martin, to her daughter, Michelle Martin-Thom, between May 28, 2021, and June 10, 2021, and the text messages received by Marnie Martin from her daughter, Michelle Martin-Thom, between May 28, 2021 and June 10, 2021. The texts sent by Marnie Martin are indicated by the initials MM, and the texts sent by Michelle Martin-Thom are indicated by the initials MMT.

MMT	05-30-21	10:00 AM	 <p>Mom, I'm out shopping for this bike-packing trip Jeff talked me into. Leaving this Tuesday. Jeff said we'd be in Buffalo in about 10 days. He's got all the camping gear but I need a few things. Picked up a light-weight sleeping bag, backpack, helmet &amp; a couple water bottles. One for me &amp; one for him. Mine's apple green &amp; his is yellow. Here's a photo. Not sure he'll use his. He has one but it's basic &amp; not a bad idea to bring an extra. I'll show you everything when I get home. See you.</p>
MM	05-30-21	10:20 AM	Love it & love you so I have to ask you this one more time. Are you absolutely sure? I'm worried about you doing this. Roughing it isn't your thing. It's not like going to the summer house & not having everything you have at home. NO bed. NO shower. NO AC. NO home cooked meals. NO over protective mother :-)
MMT	05-30-21	11:00 AM	Mom, I know you're worried. I get it. I also know you really don't like him & maybe that has something to do with you not wanting me to go but I'm going. Who knows I may love it & I want you too be happy that I'm doing something different & new. You always say life's a learning experience :-). At the very least, you must be REALLY HAPPY that you're going to have me out of your hair for a while.
MM	05-31-21	11:10 AM	I LOVE that you're home & that you're going to be here for a while. Glad you chose a grad program nearby instead of staying in Syracuse. You two need a breather & I need to spend as much time as I can with you before you get busy this fall. I intend to SPOIL you.
MMT	05-31-21	11:30 AM	I LOVE getting spoiled. By the way, I had to go to Starbuck's & took your Mercedes . My Beamer was out of gas. Sorry not sorry :-)
MM	05-31-21	11:50 AM	No problem but I have to ask you again. Are you SURE you want to do this. Sounds like weeks and weeks of hell to me & I know you're going to feel the same way. Since you were a kid you HATED bikes & scooters. Ever since you wiped out & ended up in the hospital.
MMT	06-01-21	08:00 AM	DAY ONE & we're off! Weather's cooler than I thought & it better warm up because ALL I brought were shorts & t-shirts.
MM	06-01-21	08:10 AM	The weather report said this is the last cold day for a while. Going to get REALLY HOT & RAINY for the next week or so. In the 90's. Worried you won't get enough water. Make sure you stay hydrated.
MMT	06-01-21	08:20 AM	Don't worry about that. I have my new water bottle on my bike. It's green for good luck & I may need it if I'm in over my head like you keep saying. I'll text you tomorrow morning. Love you!
MM	06-02-21	08:00 AM	It's DAY TWO. Are you up and getting ready to go. I want details!



MMT	06-02-21	08: 15 AM	It's been interesting. Definitely MORE work than I expected. Once I get use to it I'm sure it'll be fun. After all Jeff & I have been going through, we really needed this one-on-one time together!
MM	06-02-21	08:20 AM	You have been through a lot with him. By the way, I'm heading to Cornell next Wednesday to open up the house for the summer. I think a couple of friends of mine from med school will be coming for a visit. If the EST go through there maybe we can meet up!
MMT	06-03-21	08:10 AM	Sounds GREAT! I'll ask JJ. By the way, if you're going to be walking around campus, bring something warm. Heading out for DAY THREE so I've got to go. Love you Michelle.
MM	06-03-21	08:20 AM	I'm so glad we talked about doing these daily texts before you head off biking so I know you're alright.
MMT	06-03-21	08: 25 AM	Stop worrying. I'm alright except my whole body hurts. UGH!
MM	06-04-21	08:05 AM	Sorry honey. I figured that would happen & I'll try NOT to say that I told you so :-). What's planned for DAY FOUR? Albany?
MMT	06-04-21	08:15 AM	Not there yet. Jeff said we definitely should have. I think he's annoyed at how slow I am. Probably get there tomorrow. Heading out but I wanted to say I LOVE you Mom!
MM	06-04-21	08:20 AM	Love you more. Make sure you stay warm. Stay safe. Stay on course. I'm WORRIED that he'll get you lost or something in the Adirondacks.
MMT	06-05-21	08:10 AM	 <p>Mom! How did you know? Did JJ text you about what happened? Instead of heading west from Albany, he took us north towards the Adirondacks. He said it was a mistake but I think he just wanted to go to Saratoga. I tried not to get too upset about his little detour but it added another day to an already VERY LONG trip but beautiful. Hope you like this picture. Heading out for DAY FIVE.</p>
MM	06-05-21	08:15 AM	I feel so bad about the delay & REMEMBER that if it gets to be too much, I'll come get you.
MMT	06-05-21	08:25 AM	That's TEMPTING but I'm doing this for him & don't want to give up on this trip or us. I'm not a quitter. Love you Mom!
MM	06-06-21	08:00 AM	I know but the offer STILL stands. Are you up? Where are you?
MMT	06-06-21	08:05 AM	Who knows? One trail looks just like the next one. It's only DAY SIX and I'm feeling like it's been weeks & weeks. Missing you. Missing showers. Missing clean clothes. Missing feeling like a human & not a food source for all these bugs! Leaving now. Big day ahead of us.
MM	06-06-21	08:15 AM	I wish I could give you a hug & a shower & clean clothes. Can't you stop at a hotel one of these nights?
MMT	06-07-21	08:10 AM	Jeff said it's not an option. At least we'll be in Syracuse soon & we can shower there. Heading out. Will text tomorrow. Love you.




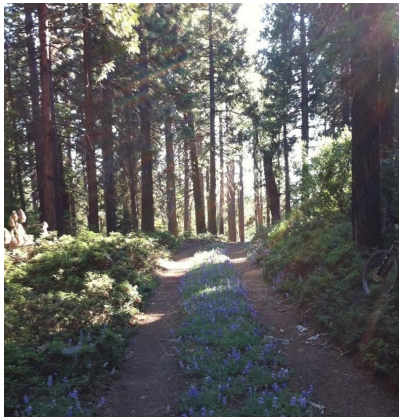
MM	06-07-21	08:15 AM	Good to hear. You need a break! When will you get to Syracuse? Tomorrow? Or Wednesday? Enjoy DAY SEVEN if you can.
MMT	06-07-21	08:25 AM	 <p>Not tomorrow. Probably Wednesday. Unless he has us doing another one of those detours. Yesterday he had us get off the EST &amp; onto this secluded trail just for kicks. The trail was sheer hell. JJ even complained that it was rough. He said he was sorry but... This is what it looked like! Isn't that crazy? Miss home. Miss you. Miss dad.</p>
MM	06-08-21	08:10 AM	Crazy & dangerous. Tell Jeff NO next time. Let him know how tough this is on you. Especially with your allergies & asthma. BE CAREFUL!
MMT	06-08-21	08:20 AM	 <p>I will say something. Have to. Last night was ROUGH because of the rain &amp; blackflies &amp; today's going to be a scorcher. Mom, I'm trying to act like this was a good idea but it wasn't. I don't mean to complain but it's either venting to you or KILLING him for talking me into this. Not saying it's all bad. This is a picture from yesterday. It's actually beautiful &amp; I love him &amp; he loves me so it is what it is. Wondering what DAY EIGHT has in store for me.</p>
MM	06-08-21	08:25 AM	You can vent to me ANYTIME. That's what moms are for!
MMT	06-09-21	08:00 AM	I can't believe what just happened. JJ just told me that we can't stay at his place tonight. JJ & his never ending problems. I've had it with him getting mad at me & bossing me around. He calls me annoying. He's annoying. You know how you offered to come get me? I'm seriously considering it. Let me calm down a bit & I'll get back to you.
MM	06-09-21	08:25 AM	Absolutely. I'll pack a bag now so I'll be ready if you give me a call tomorrow. Are you sure you're alright? Love you!
MMT	06-09-21	08:30 AM	Getting started late on DAY NINE because of our little discussion. JJ apologized to me & I apologized to him. He's really a great guy & I wanted you to know that so you wouldn't worry. Love you!
MM	06-10-21	08:10 AM	Good morning? Are you awake. What's in store for DAY 10?
MM	06-10-21	08:25 AM	What's up? Where's my morning text? Are you alright?
MM	06-10-21	08:30 AM	Honey, I'm getting worried. You know how I get. Text me or call.
MM	06-10-21	09:00 AM	Michelle. there's no reception where you are so I couldn't get a call through. I'm still at Cornell so if you need me, call me!
MM	06-10-21	09:30 AM	Honey, please... please... please call me. Love you!

EXHIBIT 9



**LAURITA COUNTY EMERGENCY CALL CENTER  
100 BERLUCCHI BOULEVARD SYRACUSE, NEW YORK 13202**

TRANSCRIPT OF 911 CALL  
CALL RECEIVED: JUNE 10, 2021 AT 10:00 AM

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911 OPERATOR: 911. What is your emergency?

CALLER: I need help. My girlfriend was in a bike accident, fell and hit her head.

911 OPERATOR: Okay. Where are you?

CALLER: On the Empire State Trail. I know we're near the State fairgrounds. I thought I saw a mile marker. Yeah. It's mile marker 174. Do you know where that is?

911 OPERATOR: Yes. We're sending you help right now. When did this happen?

CALLER: Just now, maybe a couple minutes ago. Please hurry.

911 OPERATOR: Can you tell me anything else about the fall?

CALLER: No. Can you tell me anything else about getting an ambulance here?

911 OPERATOR: Is your girlfriend conscious? Is she breathing?

CALLER: I can't tell. I don't think she's breathing. I think she's dead.

911 OPERATOR: Okay. What's the phone number you're calling from?

CALLER: 315... 315... 315-472-1830.

911 CALLER: What's your girlfriend's name?

CALLER: Her name? Her name is Michelle Martin-Thom.

911 OPERATOR: Okay. How old is she?

CALLER: She's 21. Are you sending someone up here?

911 OPERATOR: Yes. Just take a deep breath. Help is on the way. Are you hurt?

CALLER: No. Please hurry. [CALLER DISCONNECTS at 10:02 AM]

EXHIBIT 10



**LAURITA COUNTY EMERGENCY MEDICAL SERVICES  
100 LEWIN LANE SYRACUSE, NEW YORK 13202**

**EMERGENCY MEDICAL SERVICES (EMS)  
PATIENT CARE REPORT**

File Number: 1003  
Party Requesting Service: Witness Jeff Joseph  
EMT Responders: Evan Roland and Kevin Kendall  
Incident Date and Time: June 10, 2021 at 10:30 AM  
Incident Location: Empire State Trail MM 174  
Patient Name: Michelle Martin-Thom  
Address: 309 Summit Avenue, Poughkeepsie, New York  
Date of Birth: July 10, 1999  
Height Weight Sex: Female. Approximately 5 feet tall 120 lbs.  
Chief Complaint: Skull laceration from fall

INCIDENT: On June 10, 2021, around 10:00 AM, Mr. Kendall and I were notified by 911 dispatch of a distress call involving a woman who fell and hit her head on the Empire State Trail near mile marker 174. Detective Travis of the Laurita County Sheriff's Department was first to arrive, and directed me to a female who was lying in the dirt in the center of the trail. Patient was lying prone on her back and being attended to by her boyfriend, Jeff Joseph. Patient had been bleeding from laceration to her skull. Blood on ground beneath head. Patient had no pulse and was not breathing at the time of arrival. I immediately attempted life saving procedures. I attempted to open the patient's jaw to perform CPR, but I was unable to. Patient's jaw was clenched shut. Patient was moved to a stretcher and placed in the ambulance. Continued my efforts to perform life saving measures during transport. Arrived at Upstate at approximately 10:45 AM. Advised the ER staff that the patient had already expired, ER staff instructed me to bring patient to Room 117.

NOTE: Patient's boyfriend, Jeff Joseph, asked if he could travel with his girlfriend to the hospital. I advised that it was against company policy. However, Mr. Joseph started complaining that he needed medical attention. As there were no other emergency vehicles there to transport him, I agreed to transport him to the hospital. Repeatedly attempted to provide oxygen during transport and he repeatedly refused. Refused medical care when arrived at ER. He said he was distraught over this.

Dated: June 10, 2021 at 10:10 am  
Signed: Evan Roland, EMT

EXHIBIT 11



**UPSTATE HOSPITAL AND HEALTH CARE CENTER  
1125 AUTUMN AVENUE SYRACUSE, NEW YORK 13210**

**PATIENT CARE REPORT**

Date and Time:	June 10, 2021 at 11:00 AM
Incident Location:	Empire State Trail
Patient Name:	Michelle Martin-Thom
Address:	309 Summit Avenue, Poughkeepsie, New York
Date of Birth	July 10, 1999
Height Weight Sex:	Female. Approximately 5' feet tall and 120 lbs.
Chief Complaint:	Skull laceration from fall and friction burns to back
Treating Physician:	Dr. Mara Grey

**HISTORY:** Patient is a 21 year old female. This morning, she was riding a bicycle on the Empire State Trail, and fell from the bike and hit her head. Patient was with her boyfriend, Jeff Joseph, who called 911. Laurita EMT Services responded, and found patient lying on her back on the ground. There was blood on the ground beneath head. Paramedics reported that patient did not have a pulse and was not breathing. Life saving procedures were unsuccessful. Circumstances surrounding the incident and patient's medical condition were reported by her boyfriend, Jeff Joseph and Laurita EMT Services.

**EXAMINATION:** Patient was wearing dark running shoes, denim shorts, a navy-blue halter top and undergarments. Clothing was removed and put in evidence bag. Found dried blood on patient's clothing, face and back. Patient appears to be a normally developed adult female. Body is cool to the touch and postmortem rigidity is found throughout the body. Five inch laceration on the right side of patient's skull above the ear, and what appears to be a fracture of the skull. No abrasions on her extremities, face or any other part of her body. Old surgical scar on right knee.

**TIME OF DEATH:** Dead on arrival. Based on my observations, the patient died prior to her arrival at the ER. Unable to determine the exact time of death.

**CAUSE OF DEATH:** Patient suffered from a blunt force to her skull. Body being transported to ME.

**NOTIFICATION:** Notified patient's boyfriend of death and transport to ME for autopsy. Will attempt to notify the next-of-kin.

Dated: June 10, 2021 at 11:10 am

Signed: Mara Grey, MD

EXHIBIT 12



**LAURITA COUNTY  
MEDICAL EXAMINER'S OFFICE  
100 BERLUCCHI BOULEVARD  
SYRACUSE, NEW YORK 13203**

**PRELIMINARY AUTOPSY REPORT  
JUNE 10, 2021**

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CASE NUMBER:	PH-061021
DECEDENT:	Michelle Martin-Thom
ADDRESS:	309 Summit Avenue, Poughkeepsie, New York
SEX:	Female
DATE OF BIRTH:	July 10, 1999
HEIGHT AND WEIGHT:	5 feet tall 120 lbs.
BLOOD TYPE:	AB Negative
PRONOUNCEMENT:	June 10, 2021 at 11:00 AM by Dr. Mara Grey
EXAMINATION:	June 10, 2021 at 8:00 PM by Dr. Bobby Benjamin
DEATH CERTIFICATE SIGNED:	June 10, 2021 by Dr. Bobby Benjamin
CAUSE OF DEATH:	Blunt force trauma to the right rear area of the head
MANNER OF DEATH:	Undetermined

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CIRCUMSTANCES OF DEATH: Decedent is a 21 year old female with no known preexisting medical conditions. While riding a bicycle in the morning hours of June 11, 2021, the decedent fell, which resulted in her head hitting the ground to the rear right side of her head. Observed large laceration to right side of skull. Police and EMT arrived at the scene, and transported decedent to Upstate Hospital, where she was pronounced dead on arrival. The injury and circumstances surrounding it are in the medical report received from Upstate Hospital. No other records reviewed.

OPINION: Based on the autopsy examination, review of available ER record, and toxicology test results, the death of Michelle Martin-Thom was caused by blunt force trauma to the right rear area of the head. This is established to a reasonable degree of medical certainty. Based on the known circumstances, the manner of death is undetermined. Additional notes (two pages) are attached.

SIGNED BY: Bobby Benjamin, Chief Medical Examiner

DATED: June 10, 2021

**IDENTIFICATION:** Identification of the body at the time of autopsy is made by way of Medical Examiner's tags, which are present on the right wrist and left ankle, both of which identify the decedent by name.

**X-RAYS:** Full body radiographs taken prior to autopsy reveal scattered dental restorations. No foreign objects were identified via x-ray.

**CLOTHING:** Decedent's clothing was removed at hospital. According to ER record, the decedent had been wearing dark running shoes, denim shorts, a navy-blue halter top, and undergarments, and there was a great deal of dried blood on the right side of the decedent's clothing. There was blood on the right side of the decedent's face and back.

**GENERAL EXTERNAL EXAMINATION:** The body is that of an adequately nourished, normally developed, adult female appearing consistent with the documented age. The body weighs 120 pounds and measures 60 inches in length. The body is cool to the touch. Postmortem rigidity is well-established throughout the body. There is fixed pink-purple lividity over the posterior aspects of the body with the exception of areas exposed to pressure.

**HEAD:** The head has a six inch laceration on the right side of the skull above the ear. Visible from the exterior is a skull fracture and bleeding under the skin. The skin is torn primarily in a superior undermining direction, but inferior directional skin tears are also present.

**EYES:** Free from trauma.

**NOSE:** There is no palpable nasal fracture.

**EARS:** The ears are normally developed and are free of acute traumatic injuries.

**MOUTH:** The lips are free of trauma.

**FACE:** There are no other externally noticeable injuries to the face.

**NECK:** The neck is symmetrical and the trachea appears in the midline. There are no scars, masses, or tattoos.

**CHEST/ABDOMEN:** No visible injury to the chest or abdomen. No scars, masses or tattoos are present.

**EXTREMITIES:** The extremities are well-formed and all digits are present. No visible lacerations or contusions on the extremities. Evidence of prior knee surgery. Otherwise no scars, masses or tattoos are present.

**BACK:** There were no abrasions on her legs, arms, hands, face or any other part of her body. No scars, masses or tattoos are present.

**GENERAL INTERNAL EXAMINATION:** The body is opened with the standard Y-shaped incision. All abdominal and thoracic organs are present in their usual anatomic relationships.

**HEART:** The heart weighs 265 grams. The pericardial surfaces are smooth and glistening. The coronary arteries arise normally from ostia situated within the sinotubular junction. No

atherosclerosis, thrombosis or distention is present. Sectioning the heart reveals the myocardium to be red-brown and firm. There is no dilation of the atria or ventricles. No septal defects are present. The aorta has a normal course and caliber and is free of atherosclerosis or traumatic injuries.

LUNGS: The right lung weighs 300 grams. The left lung weighs 280 grams. No defect or sign of injury is present.

LIVER: The liver weighs 1280 grams. No defect or sign of injury is present.

GASTROINTESTINAL TRACT: The esophagus has the usual folded mucosal pattern. The stomach contains a brown liquid with small masses of food undigested without identifiable foreign objects or pills. There are no ulcers, tumors, or hemorrhages.

GENITOURINARY TRACT: The right kidney weighs 115 grams. The left kidney weighs 110 grams. The urinary bladder is distended and contains 200 ML of clear-yellow urine.

NECK: The hyoid bone and thyroid cartilages are intact. The thyroid and parathyroid glands are unremarkable. The larynx at the level of the vocal folds is patent and free of obstructing lesions. The tongue does not show areas of acute hemorrhage.

SPLEEN AND LYMPHATICS: The spleen weighs 115 grams. The outer surface of the spleen is smooth and gray-purple. There is no lymphadenopathy.

BRAIN: The brain weighs 1150 grams. The skull is fractured in multiple places above the right ear. There is bleeding underneath the scalp covering the majority of the right side of the head. The fracture travels from the right ear forward, across the center line of the head, down towards the left orbit around the left eye. The surface of the brain has evidence of bleeding just below the fractures along with areas of bruising on the brain involving the left temporal and left frontal lobe.

MUSCULOSKELETAL SYSTEM: There are no underlying skeletal abnormalities beyond the fractures in the skull.

SPECIMENS/EVIDENCE: The following toxicology specimens are retained: (1) Vitreous Humor, (2) Chest Cavity Blood and Serum, (3) Liver Tissue, and (4) Urine. The following evidence is collected: (1) Bilateral Hand Bags, (3) Sexual Assault Kit, (3) DNA Blood Spot Cards, and (4) Finger and Palm Prints.

TOXICOLOGY QUALITATIVE ANALYSES: Volatiles Screen by HS GC/FID; Ethyl alcohol is Negative; Alkaline Drug Screen by GC/MS; Cocaethylene is Negative; Ecgonine Ethyl ester is Negative; Ecgonine Methylester is Negative.

TOXICOLOGY QUANTITATIVE ANALYSES: Volatiles by HS GC/FID; Ethyl Alcohol is Negative.

SIGNED BY: Bobby Benjamin, Chief Medical Examiner

DATED: June 10, 2021



EXHIBIT 13



**LAURITA COUNTY  
MEDICAL EXAMINER'S OFFICE  
100 BERLUCCHI BOULEVARD  
SYRACUSE, NEW YORK 13203**

**FINAL AUTOPSY REPORT  
JUNE 17, 2021**

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CASE NUMBER:	PH-061021
DECEDENT:	Michelle Martin-Thom
ADDRESS:	309 Summit Avenue, Poughkeepsie, New York
SEX:	Female
DATE OF BIRTH:	July 10, 1999
HEIGHT AND WEIGHT:	5 feet tall 120 lbs.
BLOOD TYPE:	AB Negative
PRONOUNCEMENT:	June 10, 2021 at 11:00 AM by Dr. Mara Grey
EXAMINATION:	June 10, 2021 at 8:00 PM by Dr. Bobby Benjamin
DEATH CERTIFICATE SIGNED:	June 10, 2021 by Dr. Bobby Benjamin
CAUSE OF DEATH:	Blunt force trauma to the right rear area of the head
MANNER OF DEATH AMENDED:	Homicide

CIRCUMSTANCES OF DEATH: Decedent is a 21 year old female with no known significant medical history, who was found on the Empire State Trail with a laceration in the rear right side of her skull. Police and EMT arrived at the scene, and transported decedent to Upstate Hospital, where she was pronounced dead on arrival. Decedent's boyfriend reported that she was injured after falling from her bike.

OPINION: After further review of the autopsy findings and newly discovered evidence such as the fact she was in rigor mortis when the paramedics arrived on scene to perform life saving efforts, the manner of death is being amended from undetermined to homicide. The multiple fractures to the skull suggest more than one impact and that would not have been caused by her head hitting a dirt surface. Additionally, the evidence that decedent was in rigor mortis suggests that she had expired hours previous to her reported death. This is established to a reasonable degree of medical certainty. No additional notes/pages are attached.

SIGNED BY: Bobby Benjamin, Chief Medical Examiner

DATED: June 17, 2021

EXHIBIT 14



EXHIBIT 15

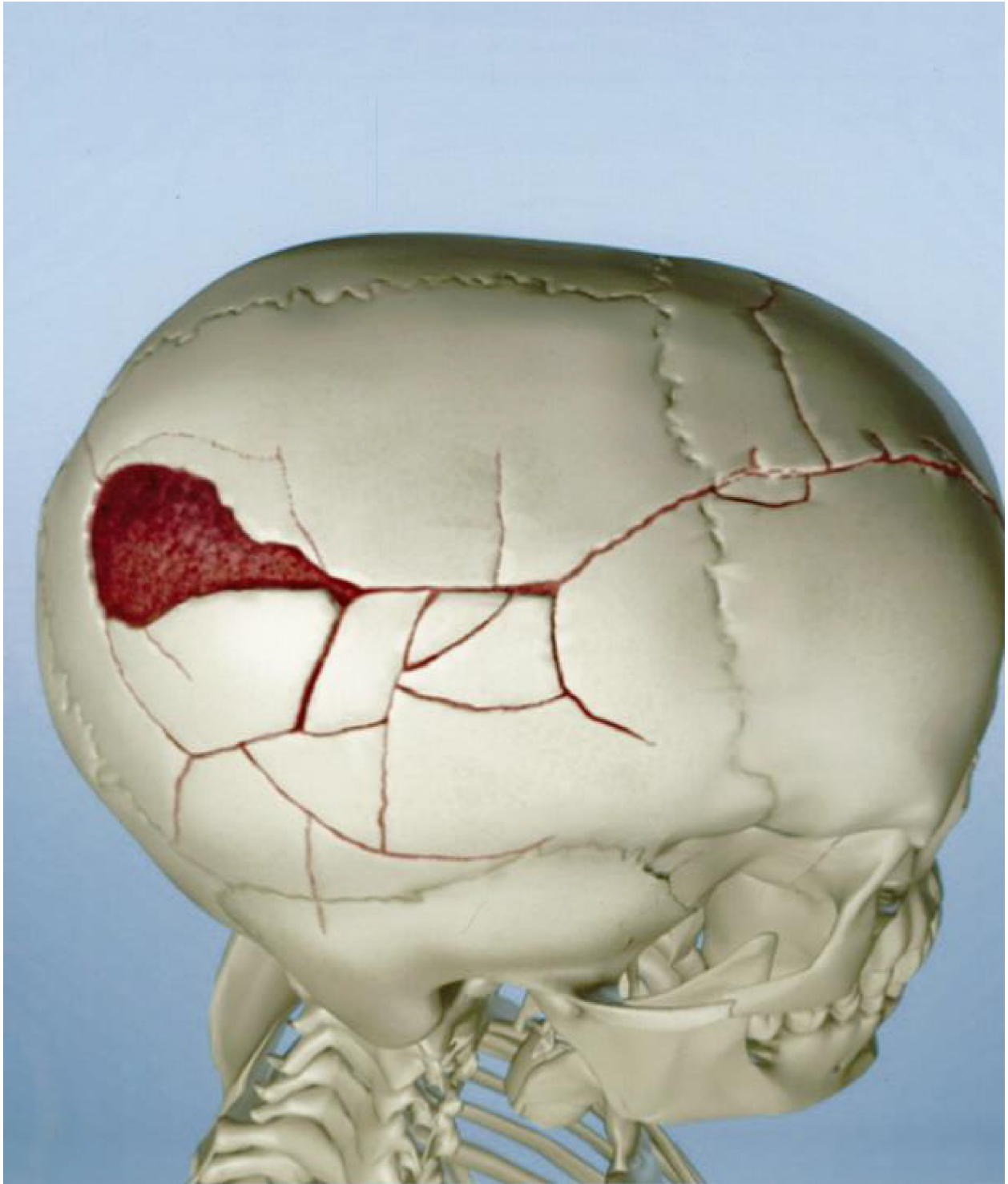


EXHIBIT 16

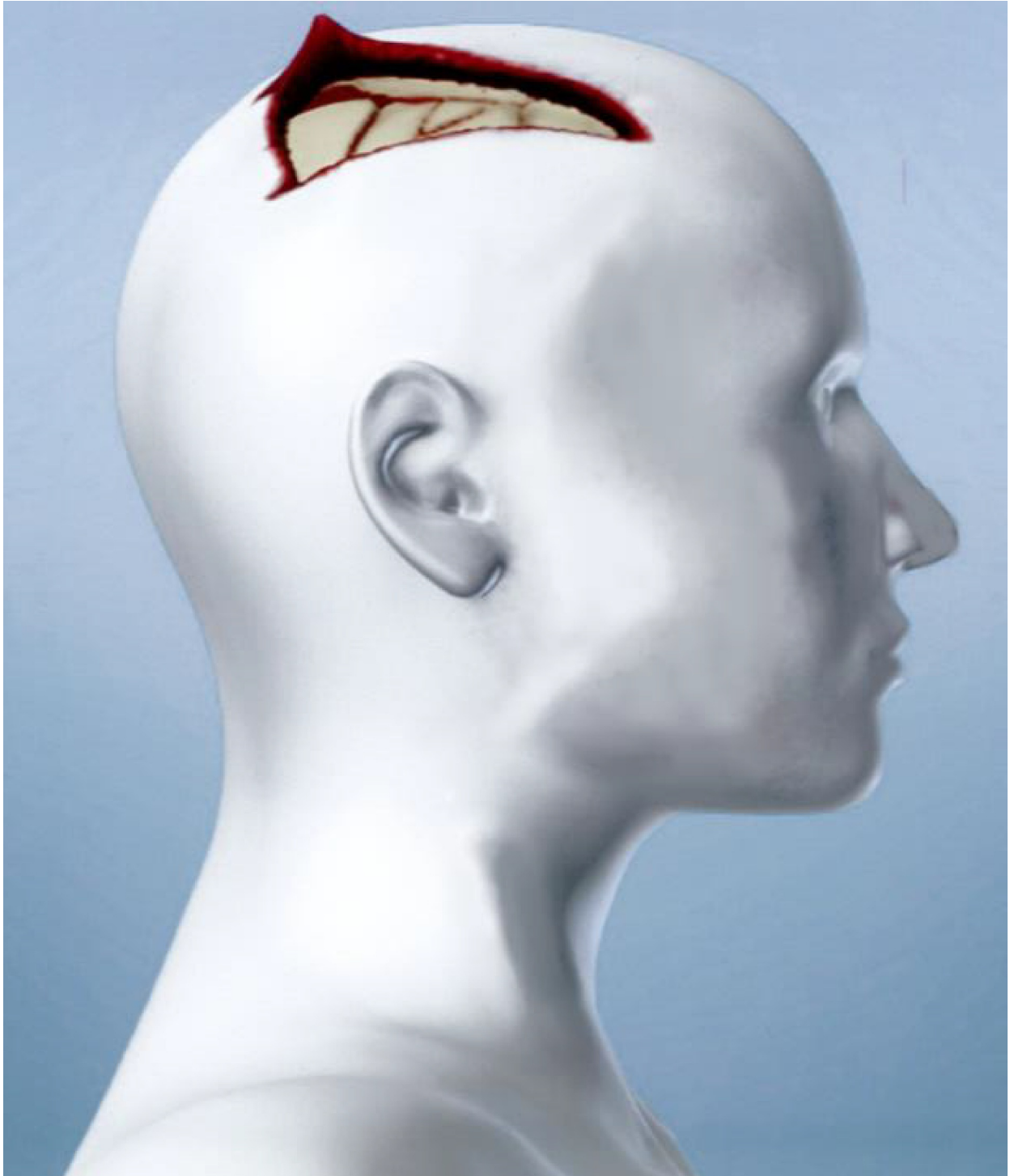


EXHIBIT 17

VOLUNTARY STATEMENT OF MARNIE MARTIN

On June 14, 2021, Marnie Martin gave this voluntary and sworn statement to Detective Tate Travis of the Laurita County Sheriff's Department, at Upstate Hospital, in Syracuse New York.

My name is Marnie Martin. I am 50 years old, and have a PhD in biochemical engineering. For the past 25 years I have been a Professor at Cornell, and only recently retired. My husband's name is Chris Ramsdell Thom, and he is an Admiral in the U.S. Navy. Presently, Chris is stationed at the Pentagon in Washington, DC. I live in Schenectady, New York, with Chris. We also have a summer home in Cornell, which is about an hour or so away from Syracuse. Chris and I have one child, Michelle Martin-Thom, who was 21 years old at the time of her death. My Michelle died on June 10, 2021.

That day, sometime around 10:00 AM, my daughter's boyfriend, Jeff Joseph, called and advised that my daughter had fallen, and was being taken to Upstate Hospital in Syracuse. I immediately drove from Cornell, where I was staying, to Syracuse. Unfortunately, by the time I arrived, Michelle had passed away. Shortly after that, I spoke to Detective Tate Travis, who was investigating the death of my daughter. I showed the detective my cell phone, which contained the text conversations between me and my daughter, Michelle, over the two week period before her death. The reason I only had two weeks worth of texts is that I ordinarily delete my texts every two weeks, and in late May of 2021, I deleted all the texts to and from my daughter.

On Monday, June 14, 2021, Detective Travis met with me again, and asked me to give him the statement that I am preparing now. The detective also asked for my cell phone so s/he could screen-shot the text messages. It's my understanding that the detective transcribed the text messages. I have seen the detective's transcription (Exhibit 8) and compared that to the actual texts. The detective's transcription is true, full and accurate as to the date, time, content and in all other respects.

CERTIFICATION: On June 14, 2021, I, Marnie Martin, certify, under penalty of perjury, that I have carefully reviewed the above statement to determine whether the answers contained are true, accurate and correct, and I hereby certify, under penalty of perjury, that the statement is true, accurate and correct.

SIGNED BY: Marnie Martin

DATED: June 14, 2021

EXHIBIT 18

VOLUNTARY STATEMENT OF FORREST FITZPATRICK

On June 21, 2021, Forrest Fitzpatrick gave this voluntary and sworn statement to Deputy Angelica Austin of the Laurita County Sheriff's Department.

My name is Forrest Fitzpatrick. I am 30 years old, and have an undergraduate degree in Environmental Science from Georgetown University. For the past eight years, I have worked as the Director at the Montezuma National Wildlife Refuge. The Wildlife Refuge stretches over 9,000 acres throughout the Finger Lakes, and is a resting place for numerous migratory birds and waterfowl. Visitors of the Wildlife Refuge can hunt, boat or fish in certain locations and can also observe the wildlife on one of the many trails we have or from one of the observation towers. The Wildlife Refuge is only open from July 1 through September 1, and one of my many duties is to survey the area and make sure we're ready to provide outdoor recreation and wildlife watching to our visitors.

On June 20, 2021, I was surveying one of the more secluded areas at the Wildlife Refuge. This area is never open to the public. However, around noon on that date, I observed a man in this area, propped up against a tree. The man was unshaven, wearing dirty clothes, and smelled god-awful. He didn't look like he had eaten for ages, and appeared to be dehydrated. As soon as I saw what condition he was in, I found a few bottles of water and a couple granola bars in my car, and gave them to the man. He gobbled up the food and drank the water so fast that it made him sick.

I asked the man what he was doing there. At first he didn't answer me, although he tried to speak. Eventually he got some words out. As best I can recall, the man said that his girlfriend died, the love of his life, and that he didn't want to live without her. I asked him how long he had been there and he said he didn't know, maybe a few days. He doesn't even remember how he got there. After the man told me that, I got on my radio and called the EMT service. I later learned that the man was Jeff Joseph.

CERTIFICATION: On June 21, 2021, I, Forrest Fitzpatrick, certify, under penalty of perjury, that I have carefully reviewed the above statement to determine whether the answers contained are true, accurate and correct, and I hereby certify, under penalty of perjury, that the statement is true, accurate and correct.

SIGNED BY: Forrest Fitzpatrick

DATED: June 21, 2021





COUNTY OF LAURITA  
FORENSIC LABORATORY  
MAHOGHANI MARZUZAN CIVIC CENTER  
222 BRAKER STREET  
SYRACUSE, NEW YORK 13202

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REPORT TITLE:	Fingerprint Blood and DNA Analysis
DATE OF REPORT:	June 16, 2021
CASE NUMBER:	PH-061021
EVIDENCE COLLECTED BY:	Carly Nicholas and Andrew Geyen-Genant Laurita County Sheriff CSI Unit
REFERRING PARTY:	Detective Travis Badge Number 040298 Laurita Count Sheriff's Department
EXAMINER(S) NAME(S):	Carly Nicholas and Andrew Geyen-Genant Laurita County Forensics Laboratory
ITEM(S) SUBMITTED:	Fingerprint Blood DNA Collected
DATE(S) SUBMITTED:	June 10, 2021 and June 11, 2021
COMPARISON SUBJECTS(S):	Michelle Martin-Thom and Jeff Joseph
COMPARISON SAMPLES:	Fingerprint Blood and DNA Profiles Obtained From Michelle Martin-Thom and Jeff Joseph

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On Thursday, June 10, 2021, Detective Travis delivered one evidence bag which contained twelve fragments of what was reportedly a helmet. The fragments were dark blue and dark gray in color, and appeared to be constructed of a lightweight carbon fiber material.

- A. Partial latent prints containing sufficient friction ridge skin patterns to be of value for comparison/identification purposes were identified on the fragments. Latent prints were identified as originating from Michelle Martin-Thom.
- B. Blood was collected from the fragments which was determined to be type AB negative blood, however, there was an insufficient amount to make a determination or DNA match to Michelle Martin-Thom or Jeff Joseph.

On Saturday, June 12, 2021, the undersigned collected fingerprint samples from Jeff Joseph's apartment, and delivered these samples to the lab for analysis. Partial latent prints containing sufficient friction ridge skin patterns to be of value for comparison/identification purposes were identified in the apartment. Latent prints were identified as originating from Jeff Joseph and Michelle Martin-Thom.



On Saturday, June 12, 2021, the undersigned collected evidence from the trunk of Jeff Joseph's car, a 2015 Ford Fusion. The evidence included the following:

- A. In the trunk of the car, the undersigned found a tool box, which contained a rubber mallet, bolt cutter, tape measure, level, hammer, adjustable wrench, utility knife, hand saw, and screwdriver. These items were in separate evidence bags, and were located in the trunk of car registered to Jeff Joseph. The undersigned delivered this evidence to the lab for analysis. Partial latent prints, containing sufficient friction ridge skin patterns to be of value for comparison/identification purposes, were identified on the tool box, rubber mallet, bolt cutter, tape measure, level, hammer, adjustable wrench, utility knife, hand saw, and screwdriver. Latent prints were identified as originating from Jeff Joseph. No other fingerprints were found.
- B. The floor of the trunk of the car was carpeted. The undersigned removed the carpeting and delivered the same to the Laurita County Forensics Laboratory for analysis. Trace amounts of bleach were found on the carpeting in the trunk.
- C. Fingerprint samples were collected from the interior, exterior and trunk of Jeff Joseph's car, and delivered to the lab for analysis. Partial latent prints, containing sufficient friction ridge skin patterns to be of value for comparison/identification purposes, were identified in the interior, exterior and trunk of the car. Latent prints in the interior, exterior and trunk of the car were identified as originating from Jeff Joseph. Latent prints in the interior of the car were identified as originating from Jeff Joseph. No other fingerprints were found.

SIGNED BY: Carly Nicholas and Andrew Geyen-Genant

WITNESS: Rachel Lucas-Guzman

DATED: June 16, 2021