

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT

STATE OF NEW MEXICO,

PLAINTIFF,

VS.

ALEXANDER RAE BALDWIN III,

DEFENDANT.

No. D-0101-CR-2024-0013
Judge Mary Marlowe Sommer

**ADDENDUM TO DEFENDANT ALEC BALDWIN'S MOTION TO DISMISS
THE INDICTMENT WITH PREJUDICE BASED ON THE STATE'S DESTRUCTION OF EVIDENCE**

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Defendant Alec Baldwin, by and through his attorneys Quinn Emanuel Urquhart & Sullivan, LLP and LeBlanc Law, respectfully submits this Addendum to the Motion to Dismiss the Indictment with Prejudice Based on the State’s Destruction of Evidence, filed on May 6, 2024 (the “Motion”).

PRELIMINARY STATEMENT

Baldwin’s *Trombetta* Motion was filed on May 6, 2024, the last day to submit dispositive motions under the Court’s scheduling order. Since then, the State has disclosed numerous materials, including statements by multiple experts, that bear directly on the issues raised in the Motion, in violation of its obligations under Rule 5-501 NMRA and *Brady v. Maryland*. Some of the late disclosures were made on the day the Motion was filed; others were made on the day the State filed its response (May 21); and others still were made after June 5, 2024, when Baldwin filed his Reply. Baldwin has been prejudiced by the timing of these disclosures in numerous ways, particularly as it relates to the Motion.¹ Baldwin respectfully submits that these materials, and the facts surrounding their untimely disclosure, should be considered by the Court in deciding the Motion.

FACTUAL ADDENDUM

The State has built its case around unproven assertions that the gun Baldwin was given on the set of *Rust* was properly functioning and could not have gone off unless he pulled the trigger.

¹ See, e.g., *Biles v. United States*, 101 A.3d 1012, 1020 (D.C. Cir. 2014) (“[T]he suppression of material information can violate due process under *Brady* if it affects the success of a defendant’s pretrial suppression motion.”); *McChuskey*, 2012 WL 13081295, at *8 (*Brady* violation occurs when the government fails to disclose material “in time for a defendant to make meaningful use of it”); *United States of Am., Plaintiff, v. Brant Daniel, Defendant*, 2021 WL 2808706, at *3 (E.D. Cal. July 6, 2021) (“In most cases, this means the prosecution must disclose evidence ‘in time for it to be of use at trial,’ . . . But there are exceptions for ‘certain pretrial proceedings, such as suppression hearings,’ when information must be produced sooner.”); cf. *United States v. Raddatz*,

In support of these assertions, the State has consistently pointed to statements from its two experts, Lucien and Michael Haag, concluding that (1) the “fatal incident was the consequence of the hammer being manually retracted to its fully rearward and cocked position followed, at some point, by the pull or rearward depression of the trigger,” and (2) the gun “functioned properly and as designed and intended by the manufacturer.” The first conclusion is based on the Haags’ initial examination of the firearm performed on July 3, 2023, the results of which were published in a report dated August 2, 2023 (the “First Haag Report”). The second conclusion is based on a second examination that was performed on August 24, 2023, the results of which were published in two separate reports, dated August 26, 2023 (the “Second Haag Report”), and August 31, 2023 (the “Third Haag Report”), respectively. Yet despite the State’s continuing obligation to promptly disclose all three reports, the State did as follows:

- It immediately disclosed the First Haag Report, which generally supports the State’s theory of the case.
- It told grand jurors about the conclusions of the Second Haag Report (without mentioning the report itself), which also generally support the State’s theory of the case.
- In April 2024, when Baldwin learned about the Second Haag Report, which had never been disclosed, it immediately provided Baldwin with a copy—*without* mentioning or disclosing the Third Haag Report.
- On May 21, 2024, when Baldwin learned about the Third Haag Report—which *contradicts* the State’s theories—it finally disclosed that report as well.

In sum, in August of last year, the State received three reports from its firearm experts. Two of the reports tend to support the State’s theory of the case; the third report does not. The State immediately disclosed the first report; held onto the second report (while disclosing its core

447 U.S. 667, 677–78 (1980) (“[T]he resolution of a suppression motion can and often does determine the outcome of the case; this may be true of various pretrial motions.”).

conclusions to the grand jury and the Court); but *withheld the third report in full* until Baldwin inadvertently learned of its existence six weeks before trial.²

The Haags were first retained in early 2023. Their assignment was to interpret the FBI's findings about the firearm and conduct further analysis. In a report dated August 2, 2023, based on the Haags' initial examination of the firearm, the Haags argued that the "fatal incident was the consequence of the hammer being manually retracted to its fully rearward and cocked position followed, at some point, by the pull or rearward depression of the trigger." Ex. 1 (First Haag Report), at 26. On August 24, 2023, the Haags traveled to Santa Fe at the State's request to perform a second examination of the firearm.³ The Haags prepared a supplemental report, dated August 26, 2023, which concludes that the revolver—which had been destroyed by the FBI—"functioned properly and as designed and intended by the manufacturer." Ex. 2 (Second Haag Report).

The First Haag Report was promptly disclosed to Baldwin. The Second Haag Report was not. Instead, Baldwin first learned of the Second Haag Report roughly seven months after it was prepared, on April 29, 2024, during a pretrial interview of Lucien Haag in which he referred to a "supplemental report" that was prepared in connection with the examination that occurred in Morrissey's presence on August 24, 2023. *See* Ex. 5 at 44:14-18 (COUNSEL: "[T]he report I have, as I understand it, does not address the part of the testing where you guys put the broken evidence

² In a separate motion filed concurrently with this Addendum, Baldwin moves for relief to remedy the prejudice caused by the State's discovery violations, which go well beyond the untimely disclosures raised here.

³ Baldwin had no knowledge of the Haags' second examination of the firearm—in which Morrissey evidently participated—until February 2024, when Baldwin first obtained recordings of the grand jury proceedings. *See* Ex. 4 at 132:6-18 (MORRISSEY: "And after you generated [the First Haag Report], were you asked to do a small amount of additional testing on the gun?" HAAG: "Yes, because *you* had a very good idea." MORRISSEY: "Thank you. So where – where did *we* do that testing?" HAAG: "*We* did that – a follow-up set of exams at the Santa Fe County Sheriff's Office evidence storage unit." MORRISSEY: "And did *we* create some videos there?" HAAG: "*We* did.") (emphasis added).

hammer back in to test whether it would hold that full-cock notch. Is that correct in your recollection or am I missing it in the report?” HAAG: “No, I think that was – you know, I need to look at my supplemental report.”). At that point in the interview, when it became clear that Baldwin’s counsel had never seen the report Haag was referring to, the State began to look for the Second Haag Report on its server and quickly located it “under Luke Haag’s file.” *Id.* at 45:23-46:15. Upon locating the report, Morrissey stated:

I see it in our server, but . . . we don’t get into the defense disclosure server because we don’t want a bunch of people monkeying around with things for fear that something would not appear there. Let me do a little bit of more research on when a request was generated to have this added to the defense share, and I’ll get back to you. . . but I see it, so what I’m going to do is I’m going to email it to you to make things easier.

Id. at 46:22-47:6.

One would expect that in the process of pulling and sending the Second Haag Report, which was saved “under Luke Haag’s file,” the State would also have sent the Third Haag Report, which the State received from the Haags just five days after receiving the Second Haag Report. *See* Ex. 3; *see also* Ex. 6. At the very least, one would think the Third Haag Report would have turned up while Morrissey was supposedly “do[ing] a little bit of more research” on why the Second Haag Report hadn’t yet been added to the “defense share” (*i.e.*, the shared online drive through which the State had been making its disclosures). Moreover, the State should have known that if the Second Haag Report had never been disclosed to Baldwin, chances are the Third Haag Report hadn’t been disclosed either—indeed, Baldwin’s counsel made that unequivocally clear during Lucien Haag’s April 29 pre-trial interview. *See* Ex. 5 at 43:25-44:3 (“So I have a report from you dated August 2, 2023 . . . *Is there any other report that you’ve prepared in this case?*”); *id.* at 44:5-6 (“*Have you been asked to prepare additional reports?*”); *id.* at 45:13-15 (“*Do you know if you’re going to write up any supplement or addition to this report based on that testing?*”). But after

learning of its failure to disclose the Second Haag Report and being told that Baldwin was not aware of any other reports, the State did nothing to confirm whether it had disclosed the Third Haag Report.

Three weeks later, on May 21, 2024, Baldwin conducted a pretrial interview of Lucien Haag's son, Michael Haag, to prepare for his anticipated testimony at trial. During the interview, Haag referenced *multiple* "supplemental reports," at which point Baldwin's counsel first learned about the Third Haag Report. *See* Ex. 7 (Transcript of 5/21/24 Interview of M. Haag) at 31:23-33:21. The Third Haag Report appears to have been based on the same evidentiary viewing that Morrissey organized and attended on August 24, 2023. *Compare* Ex. 2, at 2 ("On August 24, 2023, this writer traveled to the Santa Fe County Sheriff's Property Facility and met with Detective Hancock at approximately 9:15am at which time she produced the inoperative evidence Pietta revolver"), *with* Ex. 3, at 2 ("On August 24, 2023, this writer traveled to the Santa Fe County Sheriff's Property Facility and met with Detective Hancock at which time she produced SFSO Item 1, the previously-examined Pietta revolver"); *see also* Ex. 4 at 132:6-18.

The difference between the State's Second Haag Report and the Third Haag Report, however, is that while the Second Haag Report generally supports the State's theories about the firearm, the Third Haag Report does not. The report, dated August 31, 2023, sought to answer the question of "whether the observed damage on the hammer's full-cock notch was the result of the FBI's testing to the point of component failure, or if this damage could have been pre-existing (present at the time of the incident on the Rust set)." Ex. 3, at 2. Specifically, the purpose of the report was to identify the origin of certain "unexplained toolmarks present on the working surface and sides of the evidence trigger/sear." *Id.* The report concludes that it is "unlikely . . . that these toolmarks are the result of the damage incurred during the FBI's impact testing" and that they "do

not appear to original manufacturing marks or use and abuse toolmarks based on [their] irregular orientation”—undermining the Haags’ earlier conclusions that the revolver “functioned properly and as designed and intended by the manufacturer.” *Compare id. with* Ex. 2 at 2; *see also* Ex. 7 at 56:4-9 (admitting the Third Haag Report shows that “while there are marks there that don’t conform to what we would expect for manufacturing marks, because the impactive testing and the damage, there’s no way to necessarily know what those marks are from,” and you “can’t know a hundred percent either way”).

Despite the State’s awareness of these admissions and their impact on the credibility of the Haags’ previous conclusions, the State continued to represent to the Court—without having disclosed the Haags’ statements to the contrary—that forensic testing “[p]redictably . . . concluded that the trigger of the gun had to be pulled for the gun to have discharged on October 21, 2021 and the alleged modification of the hammer was simply damage caused when the FBI struck the hammer with the mallet so many times that it finally damaged the hammer and sear.” *See* “State’s Response to Defendant’s Motion to Dismiss the Indictment” (April 5, 2024), at 17; *id.*, at 18 (“The defendant simply doesn’t have a leg to stand on concerning his claim that the hammer of the gun was modified.”); *see also* “State’s Response to Defendant’s Motion to Dismiss the Indictment with Prejudice Based on the State’s Destruction of Evidence” (May 21, 2024), at 5 (“The notion that defendant’s gun had been modified and not working properly prior to its seizure by law enforcement was . . . refuted by firearms and toolmark forensic experts.”). Morrissey made these representations in a brief submitted to this Court even though she apparently *participated* in the examination that gave rise to her experts’ undisclosed statements to the contrary.⁴ *See* Ex. 7 at

⁴ Baldwin now knows that the conclusions of the Third Haag Report were concealed from the grand jury as well—even while Morrissey elicited the *favorable* conclusions of the Second Haag

132:6-18. Meanwhile, the State has asserted, over and over, that Baldwin “violated decades-old guns safety and set safety standards by pointing the gun at a person, cocking it, and pulling the trigger.” *See* “State’s Response to Alexander Baldwin’s Motion to Dismiss the Indictment for Failure to Allege a Criminal Offense” (May 21, 2024), at 14.

The State withheld the Third Haag Report for almost nine months, even though it was received by the State *the same day* it was finalized. And it wasn’t until June 6, 2024—two weeks *after* the State finally disclosed the report itself and *after* the pretrial interview period had ended—that the State disclosed additional communications with the Haags demonstrating that the Haags prepared the report on their own initiative because they felt *obligated* to disclose their inconsistent findings. Specifically, in his cover email to the State attaching the report, Lucien Haag wrote:

Mike and I agreed that something needed to be memorialized regarding the odd toolmarks on the broken off sear tip from the evidence trigger. So that’s how this Supplemental Report starts. Mainly because anyone with serious knowledge of the working of single-action revolvers upon seeing this might incorrectly assume I (we) did not see it. And you can quickly see where such presumed oversight would go from there.

Ex. 6 (8/31/23 email from L. Haag). The State’s only explanation for why it did not disclose the report sooner came from Special Prosecutor Morrissey, who stated, “The failure to disclose the 8/31 supplemental report was mine. The day it was received I intended to forward it for disclosure but I can see from my email that I did not.” Ex. 8 (5/23/24 email from K. Morrissey). Morrissey did not explain why, if, in fact, her failure to disclose the Third Haag Report was a simple oversight, she did not disclose it when she disclosed the Second Haag Report—especially when the State was on notice that Baldwin only knew about the First Haag Report. Or why it took until

Report, which were based on the *same* examination (which Morrissey apparently attended) that generated the conclusions contained in the Third Haag Report. *See* Ex. 7 at 132:6-18.

June 6, 2024, for the State to disclose roughly 200 files from the Haags, almost all of them dating back to 2023, including previously undisclosed emails relating to the Third Haag Report.

In addition, the State waited for more than a year to disclose email communications with another one of its experts, and those emails similarly bear on the issues raised in the *Trombetta* Motion. Specifically, on May 6, 2024—the same day that the deadline to add new witnesses terminated—the State disclosed email communications with its designated firearm safety expert, Bryan Carpenter. From the time the emails were exchanged in April 2023 through numerous interactions with counsel, the Court, and the grand jury, the State did not disclose them. In one of the emails, Special Prosecutor Morrissey points Carpenter to photographs that, in her words, show the “stark difference” between the hammer notches on the gun Baldwin was given on the set of *Rust* and the notches that appear on a “brand new hammer from the exact same gun.” *See* Ex. 9. In response, Carpenter stated that he “cannot see any reason that’s functionally necessary or does not compromise the safety integrity and/or the operation of the gun.” *Id.* Carpenter followed up the next day, stating, “Though I see no reason (operationally) why that modification exists, it remains to be seen definitively if it compromised the safety and function of the revolver and who/where/why it was preformed [sic] in the first place.” Ex. 10. Carpenter’s statements undermine the State’s contentions that the firearm functioned properly and shows no signs of modifications. *See, e.g.*, “State’s Response to Defendant’s Motion to Dismiss the Indictment” (April 5, 2024)), at 18 (“The defendant simply doesn’t have a leg to stand on concerning his claim that the hammer of the gun was modified.”).

The State’s failure to disclose these materials sooner—while continuing to make arguments that clash with the documented views of its own experts—is all the more disturbing based on the State’s long history of refusing to cooperate with Baldwin’s efforts to make sense of the State’s

haphazard, incomplete, and untimely disclosures. See “Defendant Alec Baldwin’s Expedited Motion for Relief for Prosecutorial Misconduct Under Rule 5-501 NMRA and *Brady v. Maryland*” (June 17, 2024), at 13-17. Baldwin will not repeat that troubling history here. Suffice it to say the State’s repeated representations that it has fully complied with its discovery obligations could not have been made in good faith—because up until May 2, 2024, the Special Prosecutors leading this case *did not even have access* to the sharedrive through which the State had been making its disclosures, and therefore had no idea which materials had or had not been disclosed. That is extremely alarming and should be considered by the Court in deciding the *Trombetta* Motion.

CONCLUSION

For the reasons above and set forth in Baldwin’s Motion (dated May 6, 2024) and Reply (dated June 5, 2024), the Court should dismiss the indictment with prejudice or, in the alternative, prohibit the State from presenting argument or evidence to the jury that Baldwin pulled the trigger of the firearm and instruct the jury that he did not do so.

Date: June 17, 2024

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2024, a true and correct copy of the foregoing brief was emailed to opposing counsel.

/s/ Heather LeBlanc
Heather LeBlanc

EXHIBIT 1

ILLUSTRATED REPORT

of

August 2, 2023

in the matter of

STATE of NEW MEXICO

vs.

HANNAH GUTIERREZ REED

1st JUDICIAL DISTRICT

STATE of NEW MEXICO

COUNTY of SANTA FE

Case No. D-101-CR-2023-00040

FSSI Case No. 23/04CR

prepared for

Kari T. Morrissey and Jason J. Lewis

Special Prosecutors

First Judicial District, Santa Fe County, NM

by

Lucien C. Haag

Criminalist/Forensic Firearms Examiner

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FSSI Case No. 23/04CR

Introduction

This file was first opened on March 17, 2023, upon the electronic receipt of a number of pdf documents. A large box containing five (5) large binders of documents was subsequently received on April 12, 2023. Additional documents, digital images and video files were received in the weeks and months to follow. These included the Santa Fe County Sheriff's Office Incident Report, the autopsy report for Halyna Hutchins, "Jailhouse" interviews of Hannah Gutierrez-Reed, Alec Baldwin, Dave Halls, Seth Kenney and Sarah Zachry, OSHA interviews of Hannah Gutierrez-Reed, Alec Baldwin, Dave Halls, Seth Kenney, Reid Russell, and Sarah Zachry. An interview of Alec Baldwin by George Stephanopoulos on December 3, 2021. A telephonic interview of Thell Reed by Detective Hancock, transcribed January 25, 2023. A November 29, 2021, interview of Sarah Zachry by Detective Hancock.

On April 19, 2023, two (2) videos were received depicting actor Alec Baldwin in Western garb, quick-drawing a long-barreled, single action revolver and pointing it in the general direction of the video-camera.

A transcript of an April 20, 2023, interview of Seth Kenney by Detective Hancock.

Case Overview – Matters Not Likely in Dispute

This incident involves the fatal shooting of Halyna Hutchins and wounding of Joel Souza that occurred on October 21, 2021, around 1:30pm during a practice rehearsal on the RUST movie set near Santa Fe New Mexico. Actor Alec Baldwin was handling a .45 Colt caliber prop revolver manufactured by the Pietta company of Gussago, Italy while seated on a pew in a mock church. The rehearsal involved a close-up scene in which he was to quickly draw the revolver from a holster inside his coat and bring it into a forward-pointing shooting position. At some point during this session, Mr. Baldwin retracted the external hammer on this revolver while it was pointed in the direction of Ms. Hutchins behind who was standing Mr. Souza. A live cartridge in the revolver was discharged (by a means presently in dispute) resulting in a fatal, perforating gunshot wound to Ms. Hutchins and a non-fatal penetrating gunshot wound to Mr. Souza. The bullet was recovered from Mr. Souza at the hospital.

Matters to be Addressed

The issues presented to this writer were the operation and condition of the incident Pietta Model 1873 revolver at the time of the incident, how it was discharged, the source of the live cartridge, whether it could be distinguished from the various types of dummy cartridges employed in the RUST production and whether the evidence bullet and fired cartridge case were of the same design as the live ammunition recovered from the RUST movie set.

Initial Physical Evidence Receipt

On July 3, 2023, this writer and Michael Haag (Forensic Science Consultants) appeared at the Santa Fe County Sheriff's Office (SFSO) Property Facility and took possession of 52 listed items of physical evidence, many of which were later found to contain multiple sub-items. These are listed on the next page.

On July 20, 2023, two (2) additional items of evidence were received at the SFSO Property Facility. These were the decedent's jacket and the FBI Lab-generated test-fired bullets and cartridge cases from the evidence revolver. [SFSO Items 258 and 267 respectively].

Item No. 1 described as 45cal Revolver
Item No. 2 described as 2 boxes ammo
Item No. 3 described as spent 45cal round
Item No. 4 described as revolver with blocked cylinder
Item No. 21 described as jacket
Item No. 25 described as one projectile
Item No. 26 described as two 45cal rounds
Item No. 27 described as one 45cal round
Item No. 28 described as one 45cal round
Item No. 29 described as one 45 colt round w/bbs primer intact
Item No. 30 described as two 45 colt rounds w/bbs primer intact
Item No. 31 described as one 45 colt round w/holes primer intact
Item No. 41 described as two 45 colt rmds w/holes primer intact
Item No. 44 described as 13 45 colt rounds w/bbs primer intact
Item No. 46 described as one 45 colt rmd w/holes primer intact
Item No. 47 described as nine 45 colt rmds w/bbs primer intact
Item No. 58 described as one 45 colt round w/bbs silver primer
Item No. 59 described as one 45 colt rmd w/bbs primer intact
Item No. 84 described as five 45 colt rounds hole no primer
Item No. 85 described as one 45 colt round w/bbs primer intact
Item No. 87 described as 22 45 colt rmds w/bbs silver primer
Item No. 88 described as one spain 45 denix round no sound
Item No. 129 described as three 45 colt rmds w/holes no primer
Item No. 140 described as one box w/ ammo
Item No. 143 described as plastic bag w/16 spent 45 colt rmds
Item No. 144 described as 4 spent 45 colt rmds w/ silver primer
Item No. 145 described as two spent BHA 45 colt rounds
Item No. 146 described as spent S&B 45 colt round
Item No. 161 described as spent Winchester 45 colt round
Item No. 162 described as five spent 45 colt rounds
Item No. 169 described as revolver with blocked cylinder
Item No. 187 described as 45 colt round w/bbs silver primer
Item No. 194 described as 45 cal revolver with engravings
Item No. 195 described as 45 cal revolver with engraving
Item No. 196 described as 45 cal revolver
Item No. 197 described as 45 cal revolver with engraving
Item No. 198 described as 45 cal revolver
Item No. 199 described as 45 cal revolver with engravings
Item No. 200 described as 45 cal revolver with engraving
Item No. 201 described as 45 cal revolver with engraving
Item No. 202 described as 45 cal revolver
Item No. 203 described as 45 cal revolver
Item No. 204 described as 45 cal revolver
Item No. 205 described as 45 cal revolver
Item No. 210 described as one 45 caliber live round
Item No. 211 described as six suspected live rounds
Item No. 213 described as 248 spent BHA 45 colt silver primer
Item No. 215 described as 77 spent 45 colt silver primer
Item No. 234 described as one 45 cal round
Item No. 235 described as five 45 cal rounds
Item No. 236 described as nine 45 cal rounds
Item No. 237 described as ammunition box

The Evidence Revolver, SFSO Item 1

The evidence revolver, Santa Fe Sheriff's Office (SFSO) Item 1, is an Italian-manufactured facsimile of the Colt 1873 single-action (S/A) revolver chambered for the .45 Colt cartridge and made by the Pietta firm in Gussago, Italy and imported by E.M.F. in Santa Ana, California.

The serial number on this revolver is E52277. It also possesses the number "2014" stamped on the front of the frame adjacent to the cylinder pin.

This revolver was inoperative upon receipt from the Santa Fe Sheriff's Office Property Facility on July 3, 2023 at 10:30am. Subsequent disassembly of this revolver on July 6, 2023 revealed that the full-cock step on the hammer had been severely damaged, the top of the trigger's sear was broken off and the bolt (cylinder stop) was also broken. **Figure 1a** shows the revolver as first observed upon opening the evidence box. **Figure 1b** shows the broken parts which had been previously taped to the inside of the evidence box. **Figure 1c** shows the broken trigger and its temporary replacement.

FIGURE 1a

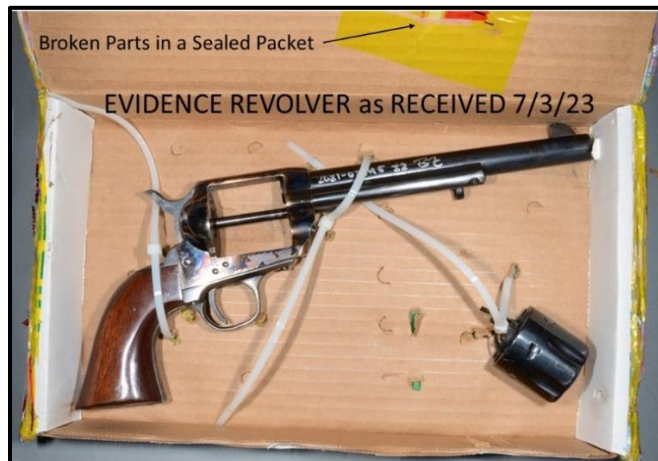


FIGURE 1b

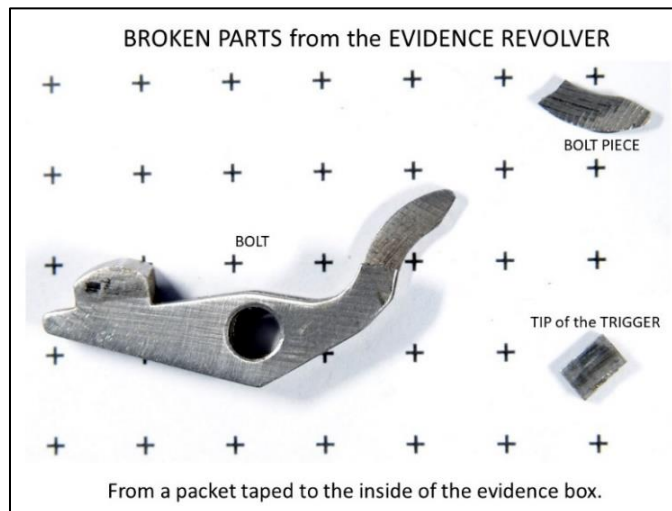


FIGURE 1c



This revolver was returned to service for test-firing and function tests by installing a new bolt purchased by this writer and the trigger and hammer from a new, unfired Pietta 1873, .45 Colt, S/A revolver, serial number E151775 owned by Michael Haag of Forensic Science Consultants, Albuquerque, New Mexico.

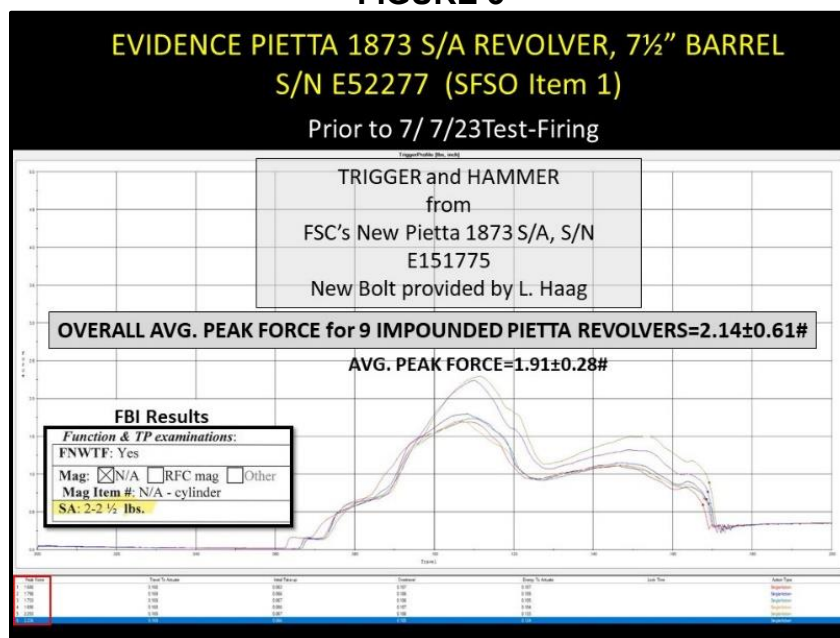
Upon reassembly, the evidence revolver was found to function properly and in accordance with the operational design of original Colt 1873 single-action revolvers. This included the timing and alignment of the cylinder and one of its six chambers with the axis of the barrel just as the retracting of the revolver's external hammer was manually drawn to the full-cock position. An untoward discharge of a live cartridge during a loss of control of the hammer during the manual retraction process *before* reaching the fully cocked position was thwarted by the hammer being captured by either the half-cock loading notch or the quarter-cock safety notch in the hammer as long as the trigger is not being depressed during this process. These two (2) intermediate hammer positions, (the half-cock or load position and the quarter-cock safety position) were also found to function properly. No "push-off" with the replacement hammer at the fully cocked position occurred when pressure was applied to the back of the hammer spur. The four (4) positions of the hammer in properly functioning Pietta 1873 revolvers are shown in **Figure 2**.

FIGURE 2



Following these function tests, the evidence revolver was mounted in a previously calibrated *TriggerScan*™ device after which multiple (6) scans were carried out to determine the average force, in pounds, necessary to discharge this firearm. These tests yielded an average trigger pull value of 1.9 ± 0.3 pounds. This value is in close agreement with the FBI Laboratory value of 2 to $2\frac{1}{2}$ pounds (measurement method presently unknown). The *TriggerScan*™ device was used with the same settings and configuration to measure the average trigger pull values of twelve (12) impounded, single action revolvers from the 'RUST' movie set, nine (9) of which were Pietta single action revolvers having the same fire control system as the evidence revolver. The average for the 12, single action revolvers (to the nearest tenth of a pound) was 2.0 ± 0.6 pounds. The average trigger pull force for the nine (9) Pietta single action revolvers was 2.1 ± 0.6 pounds. **Figure 3** depicts the *TriggerScan*™ results for six (6) measurements on the evidence revolver and includes the numerical results for the nine (9) impounded Pietta single action revolvers.

FIGURE 3



Six (6) cartridges of .45 Colt ammunition were prepared by this writer which contained 250-grain, .45-caliber, cast lead bullets and 7.0-grain charges of *Trai Boss*™ powder ignited by Remington large pistol primers. This 'Cowboy Action' load produces a calculated peak pressure of 10,830 pounds per square inch (psi) and a muzzle velocity for this bullet of 860 feet per second (fps) when fired from a Pietta M1873 single action revolver with a 7½-inch barrel. The pressures produced by this load are well within the S.A.A.M.I. peak operating value of 14,000psi for this cartridge yet sufficient to imprint a revolver's unique breechface pattern in the primers of fired cartridges. This was confirmed by the subsequent microscopic examination of the six (6) fired cartridge cases which were then scanned with the *Evofinder*™ 3D ballistic scanning device for the purpose of measuring firing pin impression depths.

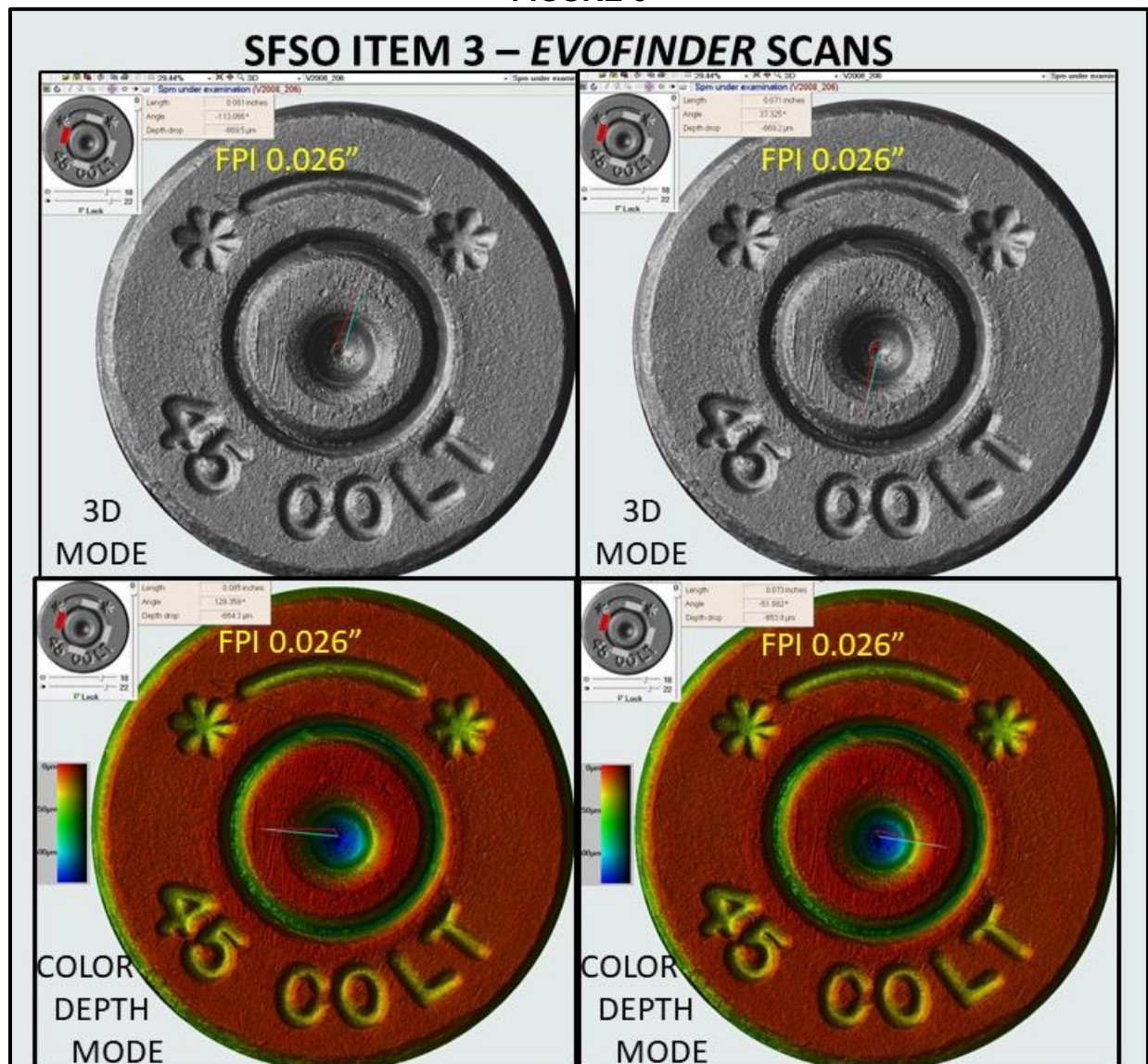
The Evidence Cartridge Case, SFSO Item 3

This item consisted of a spent, .45 Colt brass cartridge case, bearing the *Starline*™ headstamp and logo with a nickel-plated primer possessing a normal-appearing firing pin impression (FPI). The thoroughly flattened primer in the spent evidence cartridge also had well-impressed toolmarks from the associated revolver's recoil shield. These corresponded to those left in the primers of the six (6) test-fired cartridges which established the SFSO Item 3 cartridge case as having been fired in the Evidence Revolver (SFSO Item 1). The head and mouth of the Item 3 Cartridge Case appear in **Figure 4**. After calibration check scans were conducted with the instrument, the head of this cartridge case was scanned with the *Evofinder*™ 3D ballistic scanning device. The 3D and Color Depth Modes of this device were used to study and ultimately measure the depth of the firing pin impression. [See **Figure 5**] Four (4) measurements were taken from the maximum depth of the FPI to the 12 o'clock, 3 o'clock, 6 o'clock and 9 o'clock areas of the flattened primer, all of which yielded the same value of 0.026-inches.

FIGURE 4



FIGURE 5



The firing pin impressions in each of the six (6) test-fired cartridges were measured with the same device and by the same method. The results are shown in **Table 1**.

Evidence Item 267 (FBI Lab test-fired cartridge cases) This item contained twelve (12) test-fired, .45 Colt cartridge cases discharged in the evidence revolver which were of mixed headstamps* and both plain brass and nickel-plated primers.

*3 PMC, 3 W-W, 2 Winchester, 2 F-C, and 2 R-P.

Replicate FPI depth measurements were taken with the *Evofinder*™ device which yielded an average value of 0.028 ± 0.003 -inches. These measurements are shown in **Table 2**.

TABLE 1

EVIDENCE REVOLVER – ***FIRED*** PRIMERS

HANDLOADS by LUKE HAAG
 7.0gr of *TRAIL BOSS*
 250gr. LEAD ROUND NOSE-FLAT POINT BULLETS
REMINGTON BRASS LARGE PISTOL PRIMERS
 APPROXIMATE MUZZLE VELOCITY (7½" bbl.) 860fps

FIRING PIN IMPRESSION DEPTHS

0.028/0.028/0.025/0.028
 0.029/0.029/0.029/0.030
 0.031/0.032/0.031/0.029
 0.024/0.024/0.025/0.024 (Low)
 0.032/0.032/0.032/0.032 (High)
 0.031/0.031/0.031/0.031

AVERAGE of 0.029±0.003"

TABLE 2

FBI TEST-FIRED CARTRIDGES

FIRING PIN IMPRESSION DEPTHS

LH-1 PMC:	0.025/0.025"
LH-2 W-W:	0.029/0.028"
LH-3 W-W:	0.029/0.031"
LH-4 R-P:	0.022/0.022" (low)
LH-5 F-C:	0.032/0.032" (high)
LH-6 PMC:	0.031/0.031"
LH-7 W-W:	Backed Out Primer
LH-8 F-C:	0.024/0.026"
LH-9 PMC:	0.028/0.028"
LH-10 Winchester:	0.029/0.029"
LH-11 R-P:	0.026/0.027"
LH-12 Winchester:	0.026/0.027"

OVERALL AVERAGE = 0.028±0.003"

In order to produce the FPI in the SFSO Item 3 evidence cartridge case, the hammer of the evidence revolver, SFSO Item 1, had to be manually retracted to the fully-cocked position which simultaneously rotates, then locks and aligns the top chamber in the cylinder with the axis of the bore. Once this is accomplished, the trigger must either be

pulled or depressed in the usual means of discharge, or already held rearward during the cocking process in order to release and allow the hammer to fall with its full force and drive the firing pin into the fully aligned cartridge's primer. As stated previously, the necessary force applied to the trigger to fire the evidence revolver with replacement parts as measured with the *TriggerScan*™ device is approximately 1.9 pounds, which is in close agreement with the FBI measurements prior to the damage to the sear and hammer. To affect the release of the fully cocked hammer, the trigger must be pulled (moved) rearward a distance of approximately 0.10-inches. This seemingly short trigger movement is typical of traditional, Western-style revolvers including the original Colt revolvers and the various modern facsimiles. It was also in close agreement with that of a new, Pietta M1873 single-action revolver (0.11-inches) and noticeably greater than the 0.068-inch average for the nine (9) impounded Pietta .45-caliber, single-action revolvers.

The Evidence Bullet, SFSO Item 25 Recovered from Victim Joel Souza

This fired, cast lead bullet had a terminal weight of 239.7-grains. It has experienced substantial terminal ballistic damage and deformation, some of which appears to be the consequence of its passage through a heavily fouled bore to the extent that only remnants of the rifling marks were present on one side of the bearing surface of this bullet.

The surviving rifling impressions were so *indistinct* that neither a land and groove count nor a measurement of land widths was possible. The most that could be determined was that of a right-hand twist (which the evidence revolver possesses). This passage through a heavily fouled bore appears to have resulted in an extrusion effect which has reduced and altered the diameter of this .45-caliber bullet to minimum and maximum values of 0.430-inches to 0.440-inches. The general design has survived and is that of a hard cast lead, round nose-flat point bullet with a single deep lubricating groove (cannelure) approximately 0.1-inch forward of the bullet's flat base. Faint traces of an upper crimping groove could also be seen on several areas of the evidence bullet. Two views of this bullet appear in **Figure 6a** and **Figure 6b**.

FIGURE 6a



FIGURE 6b



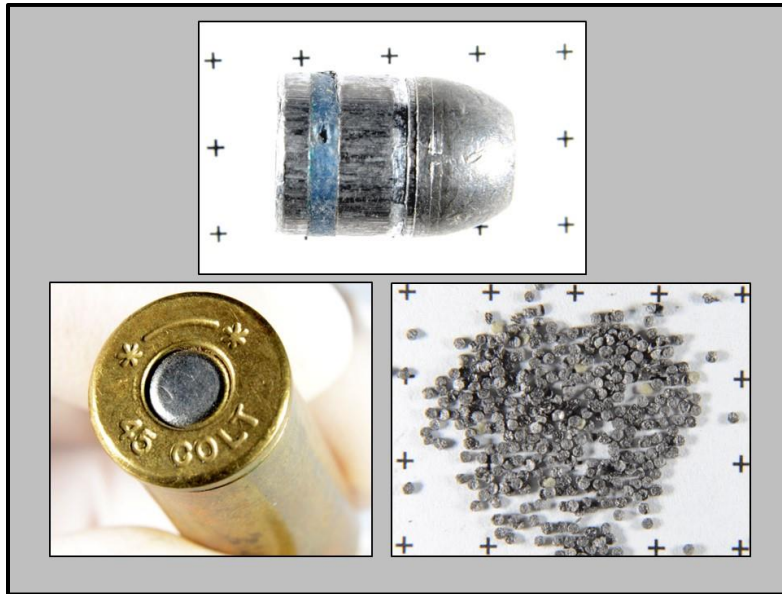
Live Cartridges from the RUST Movie Set, SFSO Items 2, 26, 27, 28

SFSO Item 2 consisted of a sealed brown paper bag marked “- - vehicle of Lt. Benavidez - -” found to contain multiple sub-items in the form of eight (8) sealed plastic packets, one of which possessed FBI sub-item number “13-1”. This item contained a previously disassembled live cartridge of .45 Colt ammunition. [See **Figure 7a**] **Figure 7b** provides a closer view of the three components of this cartridge- a virgin brass case of *Starline*™ manufacture containing a nickel-plated primer, a 250-grain hard cast, .45-caliber lead bullet and a disk-flake form of smokeless powder. This powder was comparable in form and particle size to *Bullseye*™ Pistol Powder.

FIGURE 7a



FIGURE 7b



SFSO Item 26

This item consisted of a large, sealed manila envelope marked "- - top of cart southwest of building - -" found to contain two sub-items in the form of smaller, sealed manila envelopes each containing sealed plastic packets with FBI sub-item numbers "4" and "5". Both of these inner plastic packets were found to contain a previously disassembled live cartridge of .45 Colt ammunition. **Figure 8a**, **8b** and **8c** provide successive views of FBI sub-item 4 and its contents. **Figure 9a** and **Figure 9b** provide successive views of FBI sub-item 5 and its contents.

FIGURE 8a

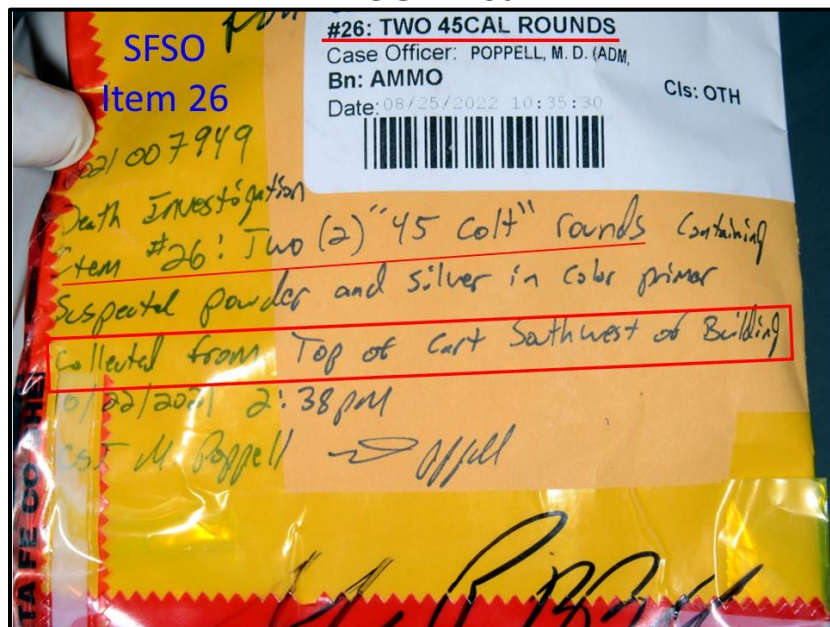


FIGURE 8b

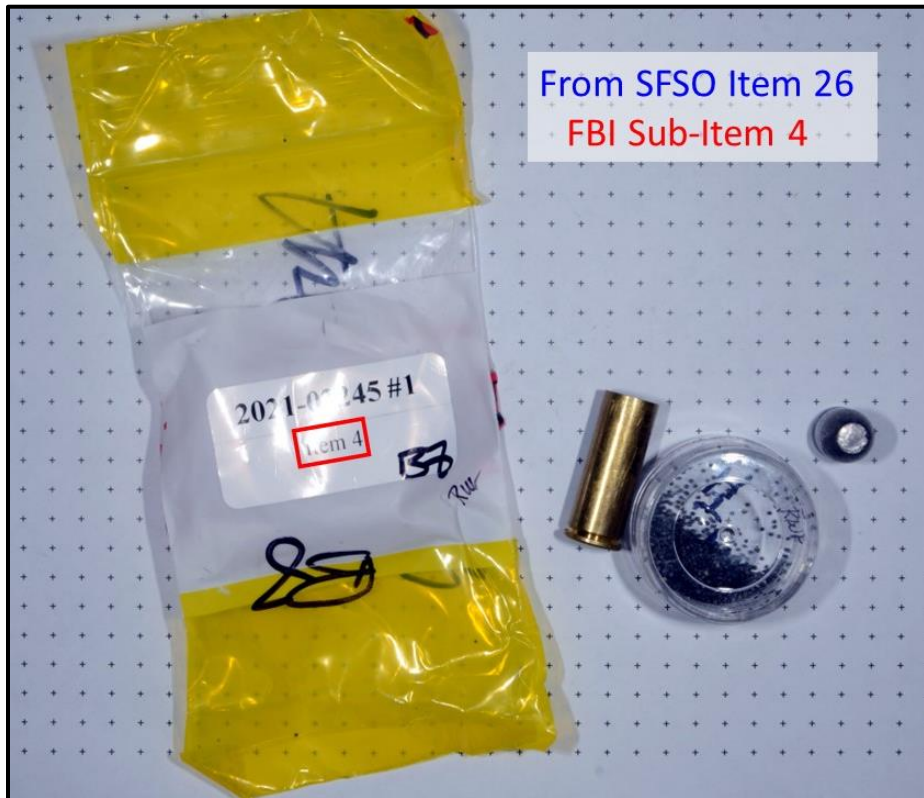


FIGURE 8c

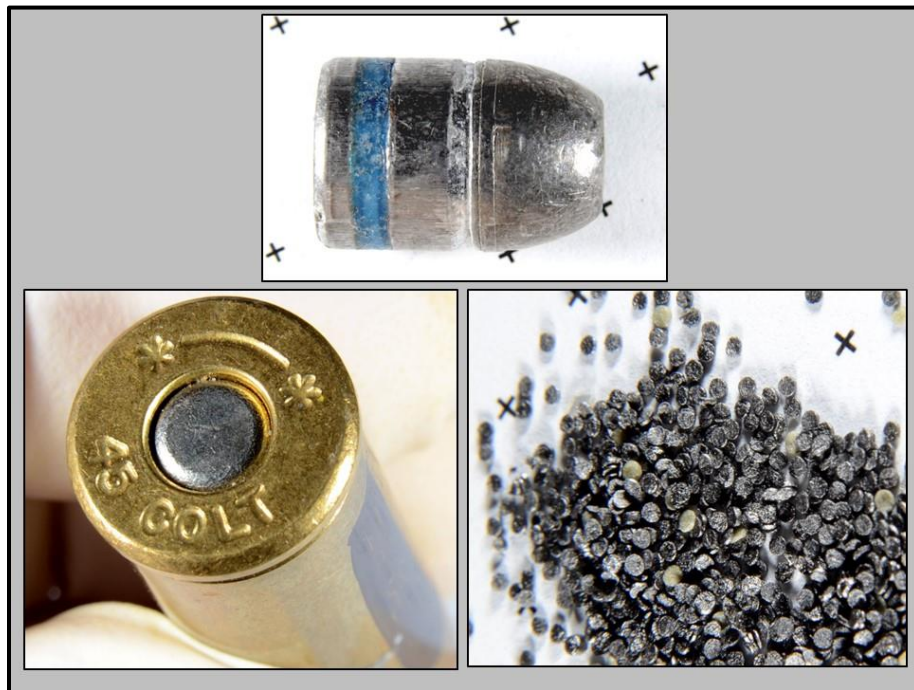
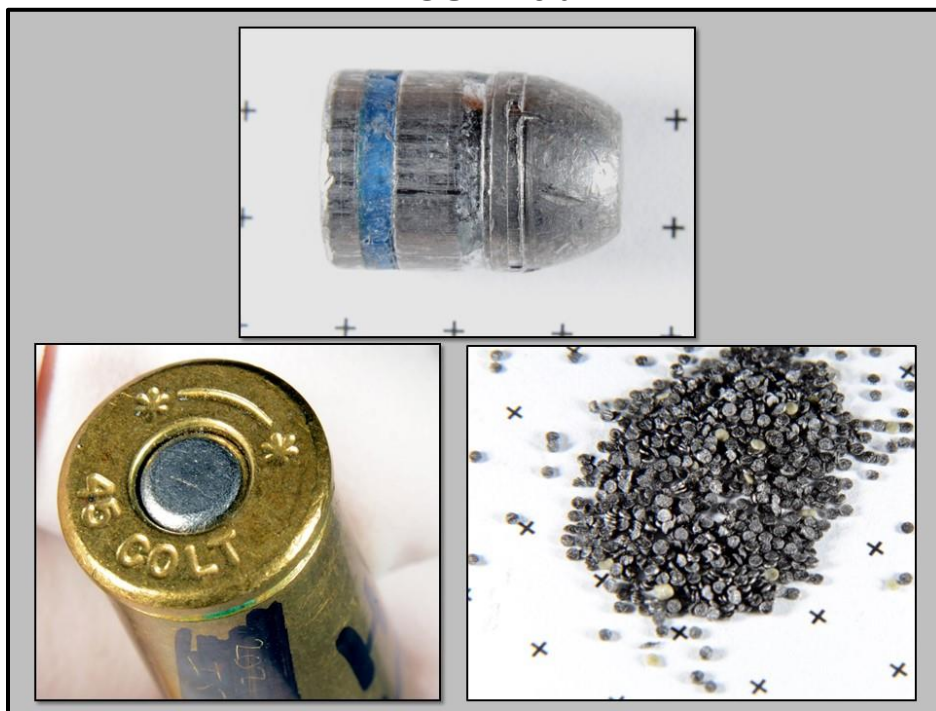


FIGURE 9a



FIGURE 9b



As with previous SFSO Item 2, these two disassembled cartridges consisted of virgin brass cases of *Starline*™ manufacture containing nickel-plated primers, 250-grain hard cast. 45-caliber lead bullets and a disk-flake form of smokeless powder comparable in form and particle size to *Bullseye*™ Pistol Powder.

SFSO Item 27

This item consisted of a large, sealed manila envelope marked "- - from bandolier, youth size, top of cart - -" [See **Figure 10a**] found to contain a previously-disassembled live cartridge of .45 Colt ammunition in a sealed plastic packet. The bullet, cartridge case and propellant in this item were the same as those in SFSO Items 2 and 26. The disassembled Item 27 cartridge is depicted in **Figure 10b** and **Figure 10c**.

FIGURE 10a

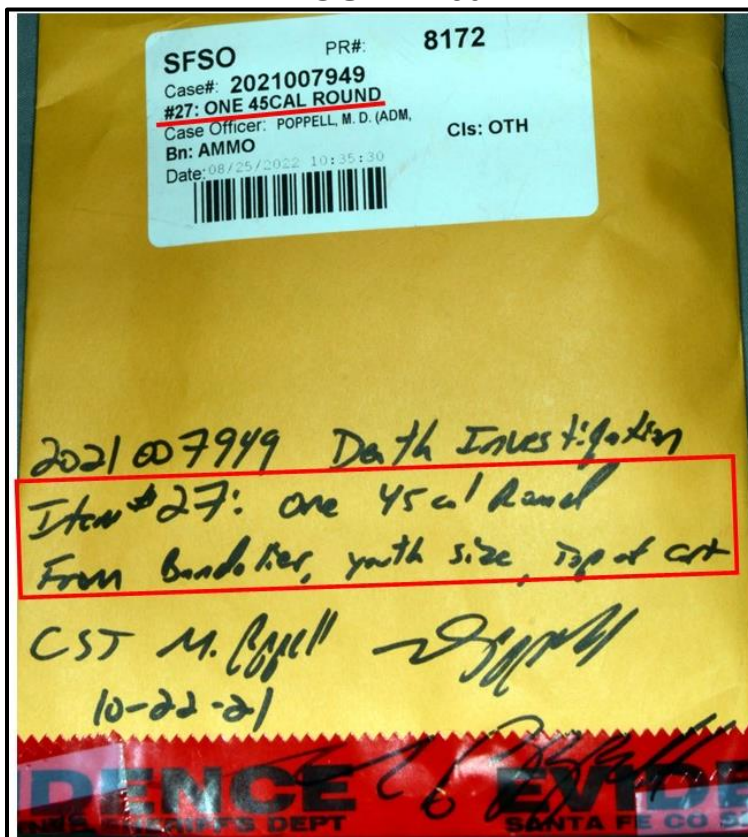


FIGURE 10b

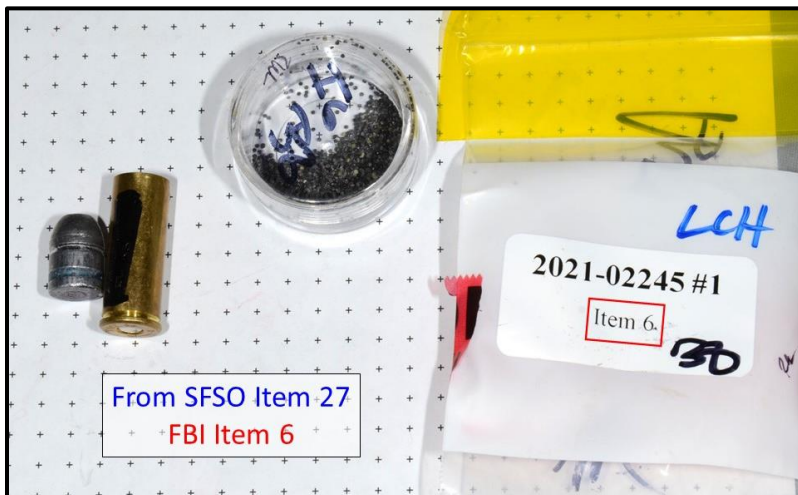


FIGURE 10c



SFSO Item 28

This item consisted of a large, sealed manila envelope with an inner, sealed manila envelope marked "- holster inside building- -"[See **Figure 11a**] found to contain a previously-disassembled live cartridge of .45 Colt ammunition in a sealed plastic packet. The bullet, cartridge case and propellant in this item were the same as those in SFSO Items 2, 26 and 27. The disassembled Item 28 cartridge is depicted in **Figure 11b** and **Figure 11c**.

FIGURE 11a

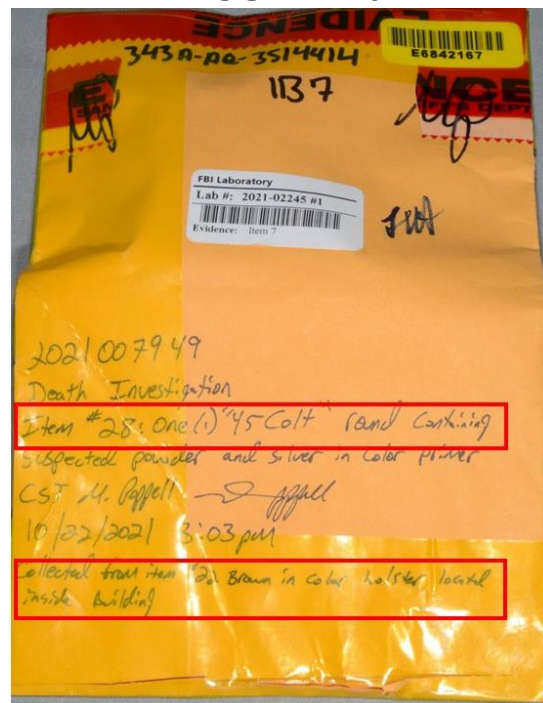


FIGURE 11b

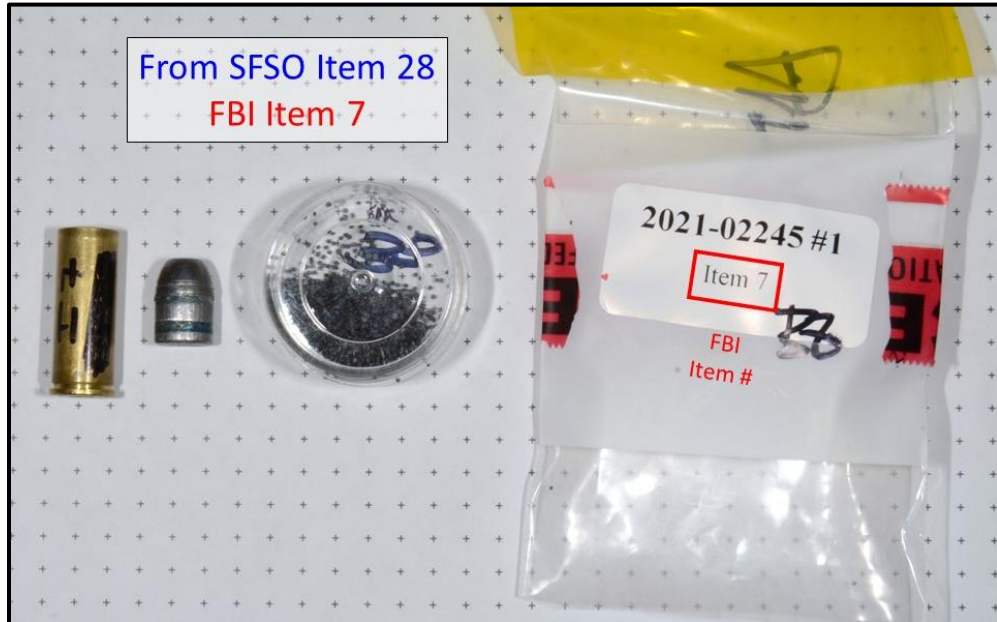
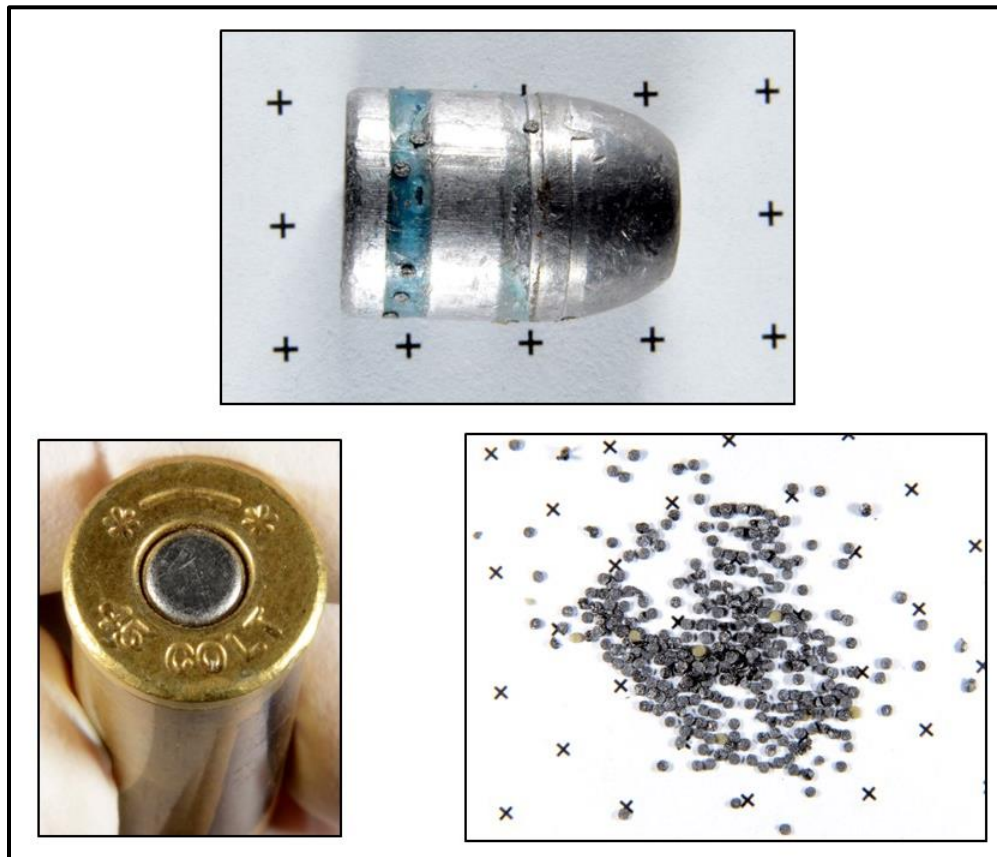


FIGURE 11c



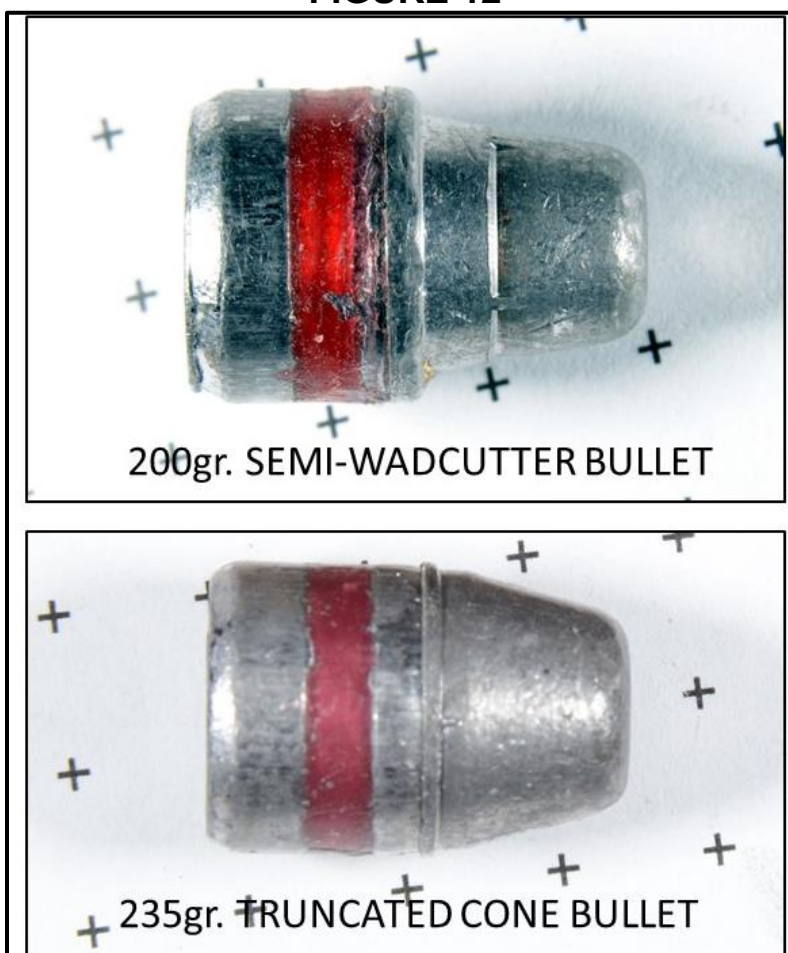
SUMMARY REGARDING THE FIVE (5) DISASSEMBLED CARTRIDGES

These five cartridges had all been loaded with the same style and weight of .45-caliber cast lead bullets. The cartridge cases were *Starline*™ brand, plain brass cases containing nickel-plated primers and a disk-flake powder comparable in form and particle size to *Bullseye*™ Pistol Powder. The design and manufacturing characteristics of these bullets were in agreement with the surviving manufacturing characteristics observed on the evidence bullet, specifically a single, deep lubricating groove (cannelure) approximately 0.1-inch above the bullet's flat base and a flat-nose and a much shallower upper crimping groove. Likewise, these cartridge cases and the fired evidence cartridge case, SFSO Item 3) were all plain brass, *Starline*™ cases containing nickel-plated primers.

Live Cartridges Collected from Seth Kenney, Albuquerque, NM SFSO Items 211, 235, 236

These cartridges contained semi-wadcutter and truncated cone lead bullets of lighter weights and different design from the SFSO Item 25 evidence bullet collected from Joel Souza. Representative examples of these bullets are depicted in **Figure 12**. These cartridges were previously disassembled by the FBI, and were found, by this writer, to have been loaded with *Trail Boss*™ powder, a propellant specifically designed for lead bullets in handgun cartridges.

FIGURE 12



Fired .45 Colt Cartridge Cases, SFSO Items 143, 144, 145, 146 and 161

These items contained fired .45 Colt cartridge cases, all of which were listed as having come from the Property Truck at the RUST movie set.

The contents of SFSO Item 143 consisted of sixteen (16) .45 Colt cartridge cases containing brass primers and bearing the *Starline*™ headstamp. [See **Figure 13**]

SFSO Item 144 contained four (4) .45 Colt cartridge cases with nickel-plated primers and bearing the *Starline*™ headstamp. [See **Figure 14**]

SFSO Item 145 contained two (2) .45 Colt cartridge cases with brass primers and bearing the *Black Hills Armory*™ headstamp. [See **Figure 15**]

SFSO Item 146 contained one (1) .45 Colt cartridge case with a brass primer and bearing the *Sellier & Bellot*™ headstamp. [See **Figure 16**]

SFSO Item 161 contained one (1) .45 Colt cartridge case with a brass primer and bearing the *Winchester*™ headstamp. [See **Figure 17**]

FIGURE 13



FIGURE 14



FIGURE 15



FIGURE 16

ITEM 146



FIGURE 17

SFSO ITEM 161



Summary for Fired .45 Colt Cartridge Cases, SFSO Items 143, 144, 145, 146 and 161

These items were described as having been collected from the “prop truck”. A minimum of four (4) firearms were represented among the 23 fired cartridge cases in SFSO Items 143, 144, 145 and 146 based on the inter-comparisons of the 3D digital scans of the primers in these items. Additional firearms were indicated but not confirmed due to the paucity of breechface markings in the primers and firing pin impressions. Item 161 is not a fired cartridge.

Test-fired cartridge cases (3 each) from the twelve (12) impounded .45 Colt caliber, single-action revolvers were scanned with the *Evofinder*™ device. None of the fired cartridge cases in SFSO Items 143, 144, 145 and 146 could be identified as having been fired from the 12 impounded revolvers, SFSO Items 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204 and 205.

Blanks and Dummy Cartridges

Blanks do not contain a projectile, nor can one be inserted in a blank cartridge. Their customary purpose insofar as Western movies or period reenactments is to make noise and smoke upon discharge in a firearm for which they are designed. The propellant employed for such purpose is either traditional black powder or one of the contemporary, black powder substitutes. All these propellants leave copious solid residues in the bores and chambers of the firearms in which they are discharged. Such heavy residues were observed in several of the impounded revolvers. FSO Item 2 contained a full, 50- cartridge carton of unfired, .45 Colt blank cartridges. This item appears in **Figure 18a** after five (5) representative blank cartridges have been removed. **Figure 18b** provides an oblique view of one of the blank cartridges and its headstamp. No fired blank cartridges were found among the numerous items of evidence examined in this case.

FIGURE 18a

From SFSO ITEM 2



FIGURE 18b



Dummy cartridges, as employed in this case, are intended to look like and to simulate real cartridges, but they are incapable of being fired. When properly assembled, this is insured by the absence of any propellant in the cartridge case and the absence of live primers.

The various .45 Colt dummy cartridges represented in the submitted evidence existed in four (4) forms as follows:

- 1) Brass *Starline*™ cases with lead round nose-flat point bullets lacking primers (empty primer pockets). Items examined in this category include SFSO Items 84 and 129.
- 2) Brass *Starline*™ cases with lead round nose-flat point bullets containing simulated brass primers and one or more spherical shot pellets within the cartridge cases to produce an audible rattle when the cartridge is shaken near one's ear. Items examined in this category include SFSO Items 2 (13-2 and 13-3), 29, 30, 46, 47 and 85
- 3) Brass *Starline*™ cases with lead round nose-flat point bullets containing nickel-plated primers and one or more spherical shot pellets within the cartridge cases to produce an audible rattle when the cartridge is shaken near one's ear. Items examined in this category include SFSO Items 58, 59, 87, 140 and 187.
- 4) Brass *Starline*™ cases with lead round nose-flat point bullets with a large, readily visible hole in the cartridge case wall. **Figure 19** provides a composite view of the four forms of dummy cartridges and the two primer finishes found in the various SFSO Items examined by this writer. Items examined in this category include SFSO Items 31, 84 and 129.

The five (5) disassembled cartridges in SFSO Items 2, 26 (2 specimens), 27 and 28 in their originally assembled form could be differentiated from the three forms of dummy cartridges in that they-

- lacked any hole in their case walls,
- would not rattle when shaken,
- possessed unstruck, nickel-plated primers,
- contained bullets that were bright/shiny compared to the often dull, partly oxidized bullets in the dummy cartridges.
-

FIGURE 19



SUMMARY: OBSERVATIONS and OPINIONS

The Pietta M1872 Evidence Revolver, Serial Number E52277, SFSO Item 1

This item was inoperative upon receipt but was returned to proper operating condition following the replacement of the gun's hammer, trigger/sear and bolt. These three parts were dimensionally indistinguishable from and fully interchangeable with the broken parts. Once installed, the evidence revolver was found to function properly and in accordance with the original Colt 1873 single-action revolver. This included the timing and alignment of the cylinder and one of its six chambers with the axis of the barrel just as the retracting of the revolver's external hammer was manually drawn to the full-cock position.

The half-cock and quarter-cock positions on the original hammer and the substitute hammer were intact and fully capable of fulfilling their intended purposes of providing a loading position and safety position for the hammer. They also provide a means of capturing the retracted hammer in situations where there is a loss of control (grasp) of the

hammer during the manual retraction process *before* reaching the fully cocked position or during a failed attempt to lower a previously cocked hammer.

The average force, in pounds, necessary to discharge this firearm with replacement parts was found to be 1.9 ± 0.3 pounds for six (6) measurements with the *TriggerScan*[™] device. These tests yielded an average trigger pull value of 1.9 ± 0.3 pounds with the highest result at 2.3 pounds and the lowest result at 1.7 pounds. This 1.9-pound value is in close agreement with the FBI Laboratory value of 2 to 2½ pounds. It is also in good agreement with the 2.1 ± 0.6 pounds average for the nine (9) impounded Pietta .45-caliber, single-action revolvers.

The amount of rearward trigger movement necessary to release the hammer from its full-cock position and fire a live cartridge was approximately 0.10-inches. This value was in close agreement with that of a new, Pietta M1873 single-action revolver (0.11-inches) and noticeably greater than the 0.068-inch average for the nine (9) impounded Pietta .45-caliber, single-action revolvers..

The Evidence Cartridge Case, SFSO Item 3

This item consisted of a spent, .45 Colt brass cartridge case, bearing the *Starline*[™] headstamp with a nickel-plated primer.

It was determined to have been fired in the previously described evidence revolver, SFSO Item 1.

Its nickel-plated primer possessed a normal-appearing firing pin impression (FPI) which measured 0.026-inches in depth. This value is in good agreement with 24 measurements taken on six (6) cartridges discharged in the evidence revolver by this writer which yielded an average FPI depth of 0.029 ± 0.003 -inches with high and low values of 0.032-inches and 0.024-inches respectively. Twenty-two (22) measurements on eleven (11) FBI-generated test-fired cartridges from the evidence revolver produced an average FPI depth of 0.028 ± 0.003 -inches with high and low values of 0.032-inches and 0.022-inches respectively.

Summary

The fired evidence cartridge is the consequence of a normal hammer fall from the fully cocked position of the hammer.

Five Previously Disassembled .45 Colt Cartridges, SFSO Items 2, 26, 27, 28

These five cartridges had all been loaded with the same style and weight of .45-caliber cast lead bullets. The bullets were 250-gr, hard-cast, .45-caliber, lead round nose-flat point bullets. The cartridge cases were virgin *Starline*[™] brand, plain brass cases containing nickel-plated primers and a disk-flake powder comparable in form and particle size to *Bullseye*[™] Pistol Powder.

the design features of these bullets were in agreement with the surviving class characteristics features of the evidence bullet, namely a single, deep lubricating groove (cannelure) approximately 0.1-inch above the bullet's flat base, an upper, crimping groove in a comparable location and a flat-nose. [See **Figure 20**] Likewise, these cartridge cases

and the fired evidence cartridge case, SFSO item 3, were all plain brass, *Starline*™ cases containing nickel-plated primers.

FIGURE 20



The Evidence Bullet, SFSO Item 25

This fired, cast lead bullet has experienced substantial terminal ballistic damage and deformation. It is consistent with having been fired through a heavily fouled bore to the extent that it possesses a slightly reduced diameter and only shows remnants of the firearm's rifling marks on one side of the bearing surface of this bullet.

The general design features which have survived discharge and impact with two gunshot victims are that of a hard cast lead, round nose-flat point bullet with a single, deep lubricating groove (cannelure) approximately 0.1-inch forward of the bullet's flat base and faint, surviving traces of an upper crimping groove.

The SFSO Item 25, is similar to the bullets from the five (5) previously disassembled live cartridges of SFSO Items 2, 26, 27 and 28 and is dissimilar to the bullets in the ammunition obtained from Seth Kenney, SFSO Items 211, 235 and 236.

The Fatal Incident

From an examination of the fired cartridge case and the operationally restored evidence revolver, this fatal incident was the consequence of the hammer being manually retracted to its fully rearward and cocked position followed, at some point, by the pull or rearward depression of the trigger. The only conceivable alternative to the foregoing would be a situation in which the trigger was already pulled or held rearward while retracting the hammer to its full cock position. Although unlikely and totally contrary to the normal operation of these single action revolvers, such improper handling, would result in the discharge of a live cartridge.

At the moment of discharge, the evidence revolver was pointed at Halyna Hutchins behind whom was Joel Souza.

The bullet passed completely through Halyna Hutchins then nearly passed through Joel Souza ending up just under the skin of his back from which it was removed at the hospital.

Although Alec Baldwin repeatedly denies pulling the trigger, given the tests, findings and observations reported here, the trigger had to be pulled or depressed sufficiently to release the fully cocked or retracted hammer of the evidence revolver.

If the hammer had not been fully retracted to the rear, and were to slip from the handler's thumb without the trigger depressed, the half cock or quarter cock notches in the hammer should have prevented the firing pin from reaching any cartridge in the firing chamber. If these features were somehow bypassed, a conspicuously off-center firing pin impression would result.

Three (3) frames from one of the videos submitted to this writer on April 19, 2023, and two (2) frames from a second video received on that same date are useful in evaluating his account of this incident.

figures 21a, 21b and 21c show Mr. Baldwin cocking the silver-colored hammer of a long-barreled revolver with his right index finger ending up on or near the trigger.

This description of the revolver in the video corresponds to the evidence revolver.

FIGURE 21a



FIGURE 21b



FIGURE 21c

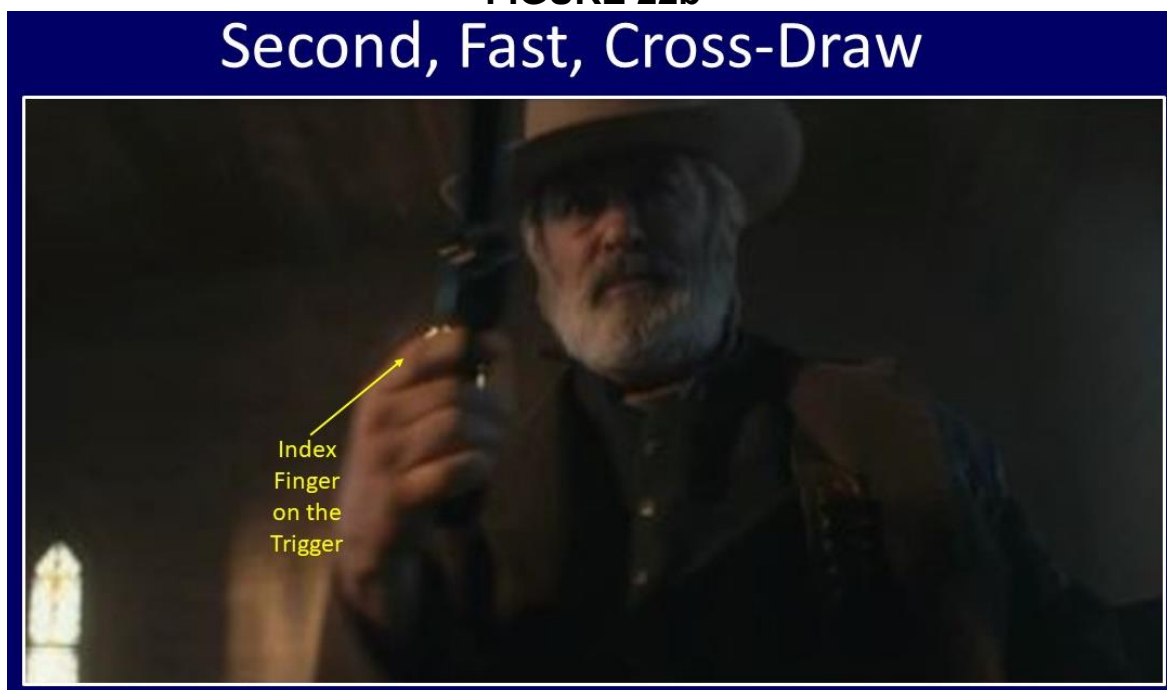


Figures 22a and 22b, taken from the second video, shows two frames from two fast-draw demonstrations in which Mr. Baldwin's right index finger is inside the trigger guard and either on, or near the trigger. His thumb is not in contact with the hammer.

FIGURE 22a



FIGURE 22b



Disposition of the Evidence

At the conclusion of the examinations, the evidence items were returned to their original containers, resealed with the seals initialed and dated for the return to the SFSO Property Facility. This occurred on the morning of August 2, 2023 at 9:30am.

Signed,



Lucien C. Haag
Forensic Science Services, Inc.
Carefree, Arizona

Technical and Administrative Review



Michael G. Haag
Forensic Science Consultants
Albuquerque, New Mexico

EXHIBIT 2

SUPPLEMENTAL REPORT

of

August 26, 2023

in the matter of

STATE of NEW MEXICO

vs.

HANNAH GUTIERREZ REED

1st JUDICIAL DISTRICT

STATE of NEW MEXICO

COUNTY of SANTA FE

Case No. D-101-CR-2023-00040

FSSI Case No. 23/04CR

prepared for

Kari T. Morrissey and Jason J. Lewis

Special Prosecutors

First Judicial District, Santa Fe County, NM

by

Lucien C. Haag

Criminalist/Forensic Firearms Examiner

FORENSIC SCIENCE SERVICES, INC.

P.O. Box 5347

Carefree, AZ 85377

FSSI Case No. 23/04CR

Introduction

This Report is a supplement to that of August 2, 2023.

On August 24, 2023, this writer traveled to the Santa Fe County Sheriff's Property Facility and met with Detective Hancock at approximately 9:15am at which time she produced the inoperative evidence Pietta revolver, serial number E52277, SFSO Item 1.

Function Tests of the Evidence Hammer in the Evidence Revolver, SFSO Item 1

The evidence revolver was disassembled and a replacement trigger, provided by Michael Haag, and a new bolt (cylinder stop latch) provided by this writer was installed by Michael Haag in this writer's presence. No other parts were installed or substituted in the evidence revolver. The singular purpose was to isolate and evaluate the function and behavior of the damaged full-cock position on the evidence hammer.

Results

Upon reassembly, the quarter-cock safety position and the half-cock load position of the evidence hammer functioned properly and as designed and intended by the manufacturer.

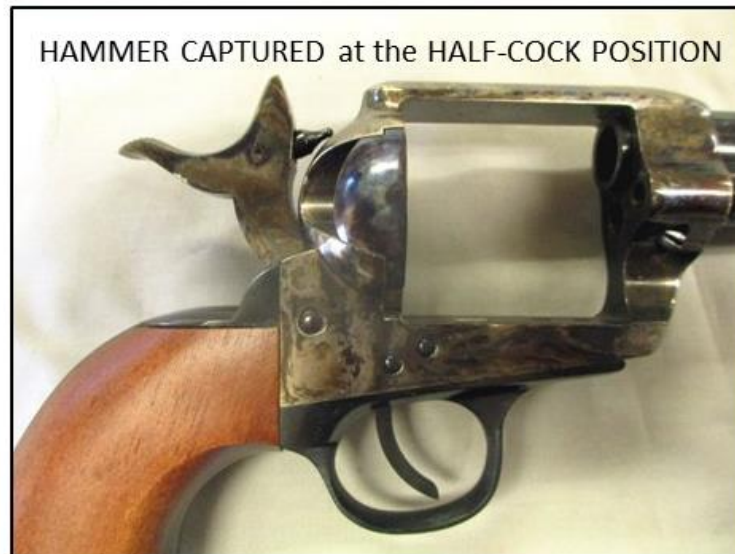
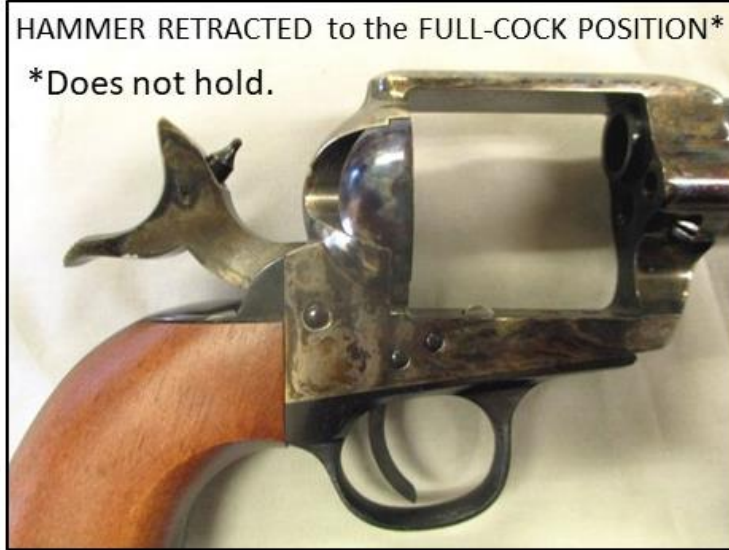
Manual retraction of the revolver's external hammer to its *full-cock* position in the customary manner (with the thumb) *immediately* resulted in the hammer falling to the half-cock position where it was captured. This hammer retraction and release test was repeated two more times with the same result whereupon it was then video-documented with three more hammer retractions and release of the evidence hammer with the same results. These tests were carried out with the cylinder removed. The evidence revolver's cylinder was re-installed and a second video-documentation carried out of the hammer's inability to maintain the full-cock position upon retraction. As before, the hammer was captured three out of three times by the half-cock position. Hammer capture by the half-cock notch in the evidence hammer would have prevented the discharge of a live cartridge in the chamber aligned with the barrel. These two positions are illustrated in **Figure 1** on the next page.

Subsequent removal of the substitute trigger revealed no damage to the sear as a result of these nine (9) hammer falls and captures by the evidence hammer's half-cock notch.

Disposition of the Evidence Revolver

At the conclusion of the examinations, the substituted parts were removed from the Pietta revolver after which it was returned to its condition upon receipt, repacked in its evidence container returned to Detective Hancock.

FIGURE 1



Signed,

Lucien C. Haag

Lucien C. Haag
Forensic Science Services, Inc.
Carefree, Arizona

Technical and Administrative Review

Michael G. Haag

Michael G. Haag
Forensic Science Consultants
Albuquerque, New Mexico

EXHIBIT 3

SUPPLEMENTAL REPORT

of

August 31, 2023

in the matter of

STATE of NEW MEXICO

vs.

HANNAH GUTIERREZ REED

1st JUDICIAL DISTRICT

STATE of NEW MEXICO

COUNTY of SANTA FE

Case No. D-101-CR-2023-00040

FSSI Case No. 23/04CR

prepared for

Kari T. Morrissey and Jason J. Lewis

Special Prosecutors

First Judicial District, Santa Fe County, NM

by

Lucien C. Haag

Criminalist/Forensic Firearms Examiner

FORENSIC SCIENCE SERVICES, INC.

P.O. Box 5347

Carefree, AZ 85377

FSSI Case No. 23/04CR

Introduction

This Report is a supplement to that of August 2, 2023.

On August 24, 2023, this writer traveled to the Santa Fe County Sheriff's Property Facility and met with Detective Hancock at which time she produced SFSO Item 1, the previously-examined Pietta revolver, serial number E52277.

The examination and testing on this date were the result of a follow up request from Special Prosecutor K. Morrissey to examine the evidence revolver in a condition that allowed for an evaluation of the damaged evidence hammer interacting with an undamaged trigger/sear. This was done in order to determine whether the observed damage on the hammer's full-cock notch was the result of the FBI's testing to the point of component failure, or if this damage could have been pre-existing (present at the time of the incident on the Rust set).

As observed and documented in the initial examination of the Item 1 evidence revolver, there are unexplained toolmarks present on the working surface and sides of the evidence trigger/sear. Manufacturing and use marks observed on the other evidence revolvers' triggers/sears and exemplar revolvers from both Forensic Science Consultant's and Forensic Science Service's reference collections demonstrated only expected, regular toolmarks that are present either in parallel or perpendicular to the front face of the sear on these exemplar triggers.

Figure 1 provides a magnified view of the expected toolmarks observed on the working surface of the sear of one of the prop revolvers, SFSO Item 201, a Pietta 1873 Great Western II, serial number E071876 impounded from the Rust set, and FSC's exemplar Pietta revolver.

Microscopic images of the sear engaging surface from the SFSO Item 1 evidence revolver compared to the FSC exemplar sear clarify the differences in toolmarks observed on these items. [See **Figure 2**] As can be seen in this figure, the exemplar sear possesses consistent, parallel toolmarks from the machining process, while the SFSO Item 1 evidence sear possesses coarse, irregular, off-axis or diagonal toolmarks of an unknown origin. It seems unlikely, although it cannot be excluded, that these toolmarks are the result of the damage incurred during the FBI's impact testing because the axis of these striae is not aligned with the direction that the hammer would have engaged and applied pressure to the sear. **Figure 3** depicts the front, facing areas of FSC's trigger/sear and that of the repositioned sear and trigger from the SFSO Item 1 evidence revolver. An edge view the broken evidence trigger is also provided in **Figure 3**.

While the toolmarks observed on the working surface and front surface of the SFSO Item 1 trigger/sear do not appear to be original manufacturing marks or use and abuse toolmarks based on striae's irregular orientation, these toolmarks also are unlikely to have had any bearing on the operation of the revolver at the time of the incident based on the FBI's trigger pull data, an FBI photograph of the hammer at full cock and substantial test-fired of the SFSO Item 1 evidence revolver conducted by the FBI prior to the damage to the trigger/sear and hammer. Their initial testing documented a lack of malfunctions and their measured trigger pull values are consistent with the numerous other evidence and exemplar revolvers examined in this case.

In conclusion, aggressive empirical testing of another exemplar revolver consisting of before and after photography of this working surface might answer the question regarding the source or cause of the coarse, diagonal toolmarks on the working surface of the evidence revolver's sear.

Function Tests of the Evidence Hammer in the Evidence Revolver, SFSO Item 1

The evidence revolver was disassembled and the previously tested and employed trigger/sear was installed. Additionally, a new bolt (cylinder stop latch) was also installed. No other parts were installed or substituted in the evidence revolver, and in fact, all other parts that provide pressure and tension to the internal mechanism (e.g., hammer spring and trigger/bolt spring) were the original components. This is important given that these original components provide the same forces required to move the hammer and trigger/sear. This means that the manner in which the trigger's sear catches the evidence hammer's undamaged half- or quarter-cock notches is as it was *prior to* FBI testing. The purpose of this examination was to isolate and evaluate the function and behavior of the damaged full-cock notch on the evidence hammer, as well as the designed safety measures to prevent discharge if the hammer slips from its full-cock position without the trigger being depressed or pulled.

Results

Upon reassembly, the quarter-cock safety position and the half-cock load position of the evidence hammer functioned properly and as designed and intended by the manufacturer.

Manual retraction of the revolver's external hammer to its *full-cock* position in the customary manner (with the thumb) *immediately* resulted in the hammer falling upon release where it was captured by the hammer's half-cock position.

This hammer retraction and release test was repeated two more times with the same result whereupon it was then video-documented with three more hammer retractions and release of the evidence hammer with the same results. These tests were first carried out with the revolver's cylinder removed, followed by installation of the cylinder for additional video-documentation. As before, the release of the retracted hammer immediately resulted in the hammer slipping from the fully-cocked position after which it was captured in every test by the hammer's half-cock position when the trigger was not depressed. **Figure 4** (taken from a video of this testing) shows the evidence hammer fully retracted immediately prior to its release. **Figure 5** depicts the evidence hammer in the process of falling, but prior to capture by the half-cock notch. **Figure 6** shows the hammer captured at the half-cock position with its integral firing pin well removed from the frame of the revolver.

Hammer capture by the half-cock notch in the evidence hammer would have prevented the discharge of a live cartridge in the chamber aligned with the barrel.

Subsequent removal of the substitute trigger revealed no damage to the sear as a result of these nine (9) hammer falls and captures by the evidence hammer's half-cock notch.

Summary

The testing conducted and described above demonstrates that:

- 1) the damage to the full-cock notch of the evidence hammer prevents the revolver from retaining a cocked status; therefore, given that this revolver retained a cocked status in video evidence from the day of the incident, as well as during subsequent FBI testing of trigger pull and the preparation of at least 10 test-fired cartridges, the damage to the full-cock notch of the evidence hammer is a direct result of the FBI's impact testing to the point of parts breakage and failure.
- 2) with the exemplar trigger/sear, this revolver performs as designed, and even when the hammer falls from the full-cock position, the designed safety measures are operable and would prevent discharge unless the trigger was depressed or pulled.

Disposition of the Evidence Revolver

At the conclusion of the examinations on August 24, 2023, the substituted parts were removed from the SFSO Item 1 Pietta revolver, after which it was returned to its condition upon receipt, repackaged in its evidence container, and returned to Detective Hancock.

Signed,



Lucien C. Haag
Forensic Science Services, Inc.
Carefree, Arizona

Technical and Administrative Review



Michael G. Haag
Forensic Science Consultants
Albuquerque, New Mexico

FIGURE 1

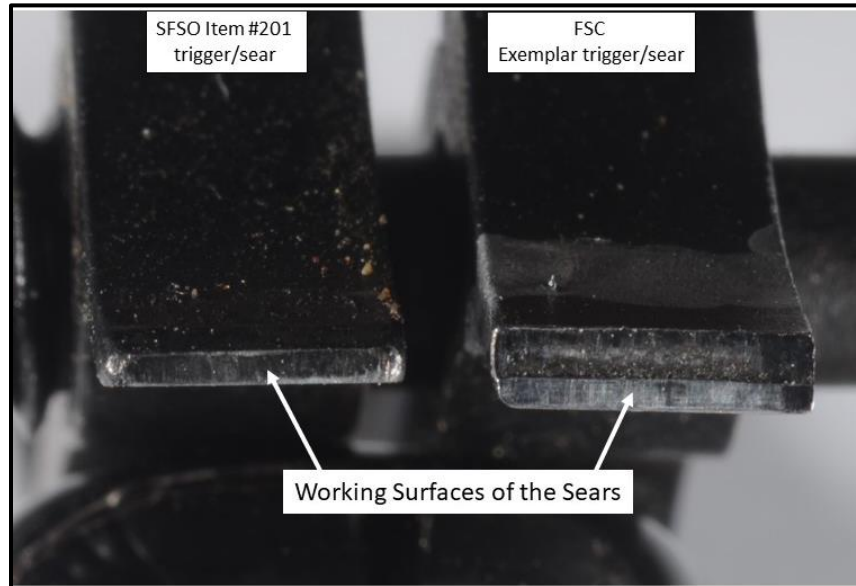


FIGURE 2

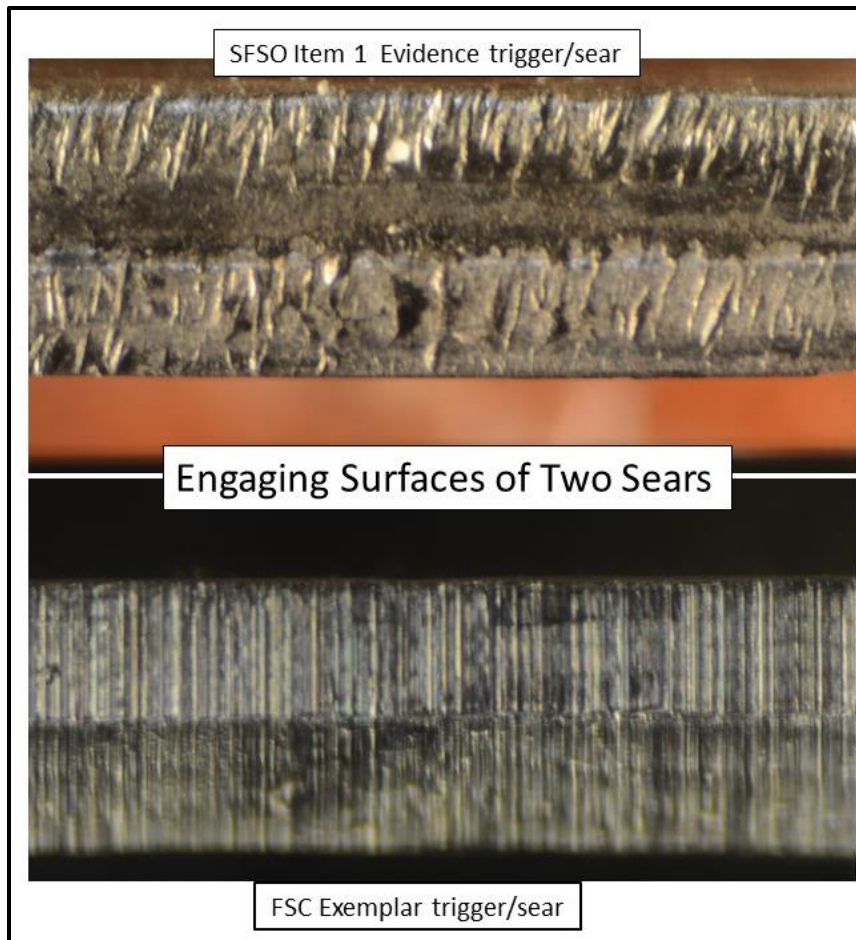


FIGURE 3

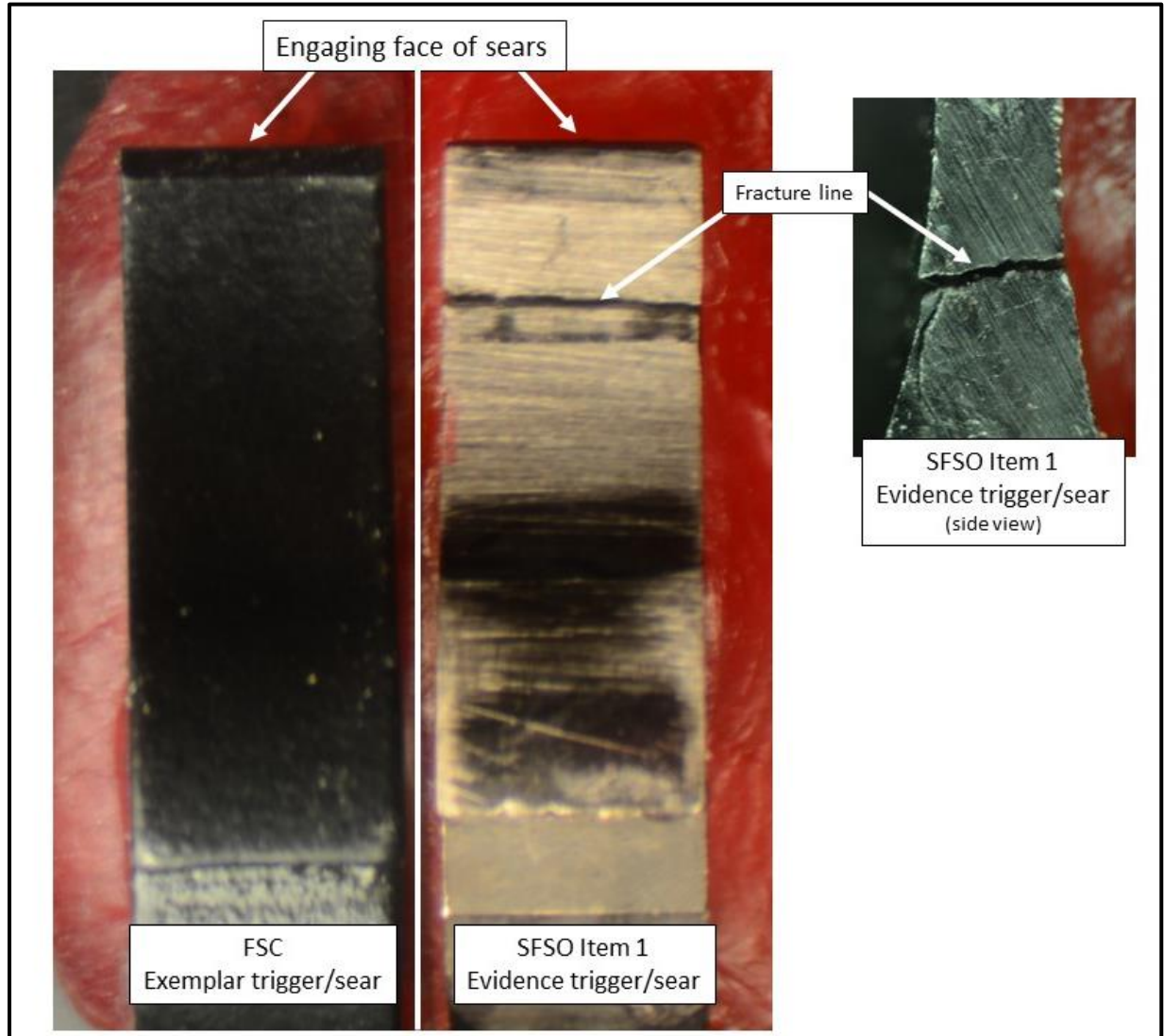


FIGURE 4



FIGURE 5



FIGURE 6



EXHIBIT 4

GRAND JURY, 01/18/2024, 9:08:37 AM

MS. MORRISSEY: I'm going to do a little reading. I apologize for that. Good morning. I'm Kari Morrissey. I'm a special prosecutor for the First Judicial District. Also present in the Grand Jury room is the court monitor along with the members of the Grand Jury. We also have --

MS. PADILLA: Alenna Padilla. I'm shadowing today.

MS. MORRISSEY: Okay. You're shadowing the court monitor?

MS. PADILLA: Court monitor.

MS. MORRISSEY: Okay. Great. And do we have an interpreter?

UNIDENTIFIED SPEAKER: Two interpreters over here.

MS. MORRISSEY: Two interpreters.

UNIDENTIFIED SPEAKER: Ashley (inaudible).

MS. MORRISSEY: Thank you. Appreciate you. And we have Shadrick Boe (ph). He is going to help us with technical issues. Today's date is January 18th, 2024. I show the time as 9:10 a.m. The District Attorney file number is SF 23-221. This morning I will be presenting to you a case where Alexander Baldwin is the target. The witnesses in this case will be Corporal Alexandra Hancock, Marissa Poppell, Michael Haag, Bryan Carpenter, Ross Addiego, Lane Luper, and Connor Rice.

1 in a damaged state such that if it had been like this
2 when the FBI received it, their reports would not read
3 as they do. This is damage from the mallet, from a
4 hammer, not only rounding this off but breaking off the
5 tip of the sear as well.

6 MS. MORRISSEY: After you and Luke completed your
7 testing, did you generate a report?

8 MR. HAAG: We did.

9 MS. MORRISSEY: And after you generated that report,
10 were you asked to do a small amount of additional
11 testing on the gun?

12 MR. HAAG: Yes, because you had a very good idea.

13 MS. MORRISSEY: Thank you. So where -- where did we do
14 that testing?

15 MR. HAAG: We did that -- a followup set of exams at the
16 Santa Fe County Sheriff's Office evidence storage unit.

17 MS. MORRISSEY: And did we create some videos there?

18 MR. HAAG: We did.

19 MS. MORRISSEY: And which gun are we using in those
20 videos?

21 MR. HAAG: In these videos, it is the actual evidence
22 revolver with the evidence hammer, all the original
23 springs and pins and screws. The only thing different
24 is my trigger and sear, which is the same shape, the
25 same size, the same manufacturer as the original

1 made for your DeLorean and you're going back to the
2 future, they'll make that for you. And they'll do
3 wardrobe and they'll do a little bit of everything.

4 So if I'm doing, let's just say, Queen of the
5 South, the TV series, and I need guns for a shootout
6 scene, then I will pick up the phone and I will call ISS
7 and I will tell them that I need the following firearms
8 that match the script. They will check those out and
9 they will ship them to me. I'm an FFL 07 license holder
10 with Alcohol, Tobacco, and Firearms.

11 MS. MORRISSEY: What does that mean, FFL?

12 MR. CARPENTER: FFL is a Federal Firearms License. In
13 my particular case, I use my FFL and my 07 license to be
14 able to maintain and have in my possession machine guns
15 which movies, no matter what anyone has -- as you've
16 seen before, most of these weapons that are on a movie
17 set are real firearms. They've just been altered to
18 fire blanks, depending on what type of gun they are,
19 from an Old West gun that you guys are dealing with here
20 today, to a modern machine gun.

21 MS. MORRISSEY: And just let me stop you there.

22 MR. CARPENTER: Mhm.

23 MS. MORRISSEY: You don't have any reason to believe
24 this gun was altered, do you?

25 MR. CARPENTER: No.

1 MS. MORRISSEY: Okay. So this would --

2 MR. CARPENTER: In fact --

3 MS. MORRISSEY: Would this be the type of gun that would
4 be altered?

5 MR. CARPENTER: No, it would not.

6 MS. MORRISSEY: Okay.

7 MR. CARPENTER: And the older ones don't require any
8 modification to fire.

9 MS. MORRISSEY: Okay. Please continue.

10 MR. CARPENTER: So after the order is in place, the
11 firearms are shipped to me. Before that happens, they
12 check them through their safety checkpoints and they
13 mail them to me. I get them, I take possession of them,
14 and then I perform another safety check on them. I look
15 at the firearms to make sure they're functionally safe
16 and they're all there, of course. Then those get locked
17 into a secure storage area that only I have access or
18 any other licensee that has access to that. They stay
19 there until it's time to prep them for the scene,
20 unless, say, the scene calls for one guy to -- one
21 police officer to fire at a drug dealer that's robbing a
22 bank, and it's one gun being fired. We'll check that
23 weapon out of the safe secure storage. I do it
24 generally the night before or the day before. I prep
25 it, look at it, make sure if it's going to be using

EXHIBIT 5

INTERVIEW WITH: LUKE HAAG, DATE: 4/29/2024

MS. CLARK: Okay, great. Are we recording? Yes. Okay. So, good morning. It is 11 a.m. Mountain Time on April 29th, 2024. This is the pretrial interview of Lucian Haag in the case of State versus Alexander Baldwin. My name is Sara Clark, counsel for the defendant, Alec Baldwin, and I'm joined by Jennifer Stern, Heather LeBlanc, and Craig Martin. Erlinda, do you want to do your side?

MS. JOHNSON: Sure. We have Erlinda Johnson, Kari Morrissey, special prosecutors on the case, along with Conor Rice, investigator, and Alexander James with the district attorney's office. He's a paralegal.

MS. CLARK: Okay, great. Mr. Haag, I know we've already had some audio issues this morning, so let's -- please continue to let me know if you can't understand or you can't hear me. I am going to do my best to speak slowly and methodically. I'm going to sound a little robotic doing that, so I apologize, but I think it will make a clearer record here. I promise I'm not a robot. Is there anybody in the room with you today?

MR. HAAG: Yes.

MS. CLARK: Okay. And who is there?

MR. HAAG: My wife.

MS. CLARK: Okay. And is she taking notes or helping

1 MR. HAAG: Yes, to extract the sear out of that deep,
2 deep half-cock notch.

3 MS. CLARK: Okay. Did you review the FBI's trigger
4 testing?

5 MR. HAAG: I reviewed all the notes provided to me, and
6 I believe the complete note package of Bryce Ziegler. I
7 didn't review any other investigative reports, just lab
8 reports. And there was also one on propellants and
9 explosive.

10 MS. CLARK: I'm sorry, on what?

11 MR. HAAG: Propellants or explosive from another unit at
12 the FBI laboratory.

13 MS. CLARK: Okay. And that was on the disassembled
14 ammunition. Is that correct?

15 MR. HAAG: Yes. Yes.

16 MS. CLARK: Okay. Make sure we're talking about the
17 same thing. Okay. Other than the push test, is there
18 any other test that you would have done given -- given
19 the testimony that you reviewed and the materials that
20 you reviewed if the gun hadn't been broken?

21 MR. HAAG: Not that I -- not that I haven't already
22 described.

23 MS. CLARK: I'm going to just take one hot second and go
24 through my notes and make sure because we jumped around
25 a little bit. So I have a report from you dated August

1 2nd, 2023. It says Illustrated Report of August 2nd,
2 2023, and it's by you. Is there any other report that
3 you've prepared in this case?

4 MR. HAAG: No.

5 MS. CLARK: Okay. Have you been asked to prepare any
6 additional reports?

7 MR. HAAG: No, I have -- no.

8 MS. CLARK: Okay. And the report that I have, as I
9 understand it, does not address the part of the testing
10 where you guys put the broken evidence hammer back in to
11 test whether it would hold that full-cock notch. Is
12 that correct in your recollection or am I missing it in
13 the report?

14 MR. HAAG: No, I think that was -- you know, I need to
15 look at my supplemental report.

16 MS. CLARK: Okay. So there is a supplemental report?

17 MR. HAAG: No, I think that's the one you're talking
18 about.

19 MS. CLARK: Okay. I can put up the one that I have to
20 avoid confusion. This is the one I'm referring to.

21 MR. HAAG: Right. You can scroll --

22 MS. CLARK: I'm happy to go to any part of it. So does
23 this report have that second set of testing on the
24 evidence hammer --

25 MR. HAAG: I'm sorry. I thought you were through. You

1 need to scroll down a little further.

2 MS. CLARK: Okay.

3 MR. HAAG: Stop there. Hold it. Yes, I think you're
4 right. The actual -- putting the damaged hammer, but a
5 proper trigger, a new trigger, a working trigger, and
6 stop latch, and what's done is just a video, several
7 videos with and without the cylinder in the gun that
8 were provided to the prosecutor, but no written report.
9 It was all -- you just had to listen to the audio to
10 understand what we were doing and why.

11 MS. CLARK: Okay. Right. And I think that I have those
12 videos, so I'm not testing that you did this. I just
13 want to make sure. Do you know if you're going to write
14 up any supplement or addition to this report based on
15 that testing?

16 MR. HAAG: I have no intention of doing so. I've not
17 been asked to do so.

18 MS. CLARK: Okay. And other than that testing, which I
19 think postdates the report we just looked at, have you
20 been asked to do any additional testing?

21 MR. HAAG: I have not been asked to do anything further
22 at this time.

23 MS. JOHNSON: Hey, Sara, you should have a supplemental
24 report dated August 26th, 2023. Luke, do you recall
25 that? It's a supplement to your August 2nd one?

1 MR. HAAG: I don't presently recall it, but obviously I
2 authored it.

3 MS. CLARK: Do you know where that is on the share file
4 or what way it was transmitted by chance, Erlinda?

5 MS. JOHNSON: I don't. I'm going to defer to Kari or
6 Alex.

7 MS. MORRISSEY: I'll have a look right now.

8 MS. JOHNSON: Okay. I'm sorry, Alex. If you're
9 speaking, I can't understand you.

10 MR. HAAG: I found my copy.

11 MS. JOHNSON: Oh, I guess he wasn't trying to say
12 something.

13 MS. CLARK: Okay. So we're good to continue?

14 MS. JOHNSON: Yeah. I found it under Luke Haag's file,
15 but I'll wait for Kari to come back.

16 MS. CLARK: Yeah, I don't think I have a file called
17 Luke Haag, so I think it must be in a different file
18 from the view I have. If you guys can point me to it,
19 that would be great. If you guys can't point me to it,
20 we may -- I'm going to reserve the right to come back
21 once I've had a chance to review it with Mr. Haag.

22 MS. MORRISSEY: So I see it in our server, but Sara, I'm
23 not -- we don't get into the defense disclosure server
24 because we don't want a bunch of people in there
25 monkeying around with things for fear that something

1 would not appear there. Let me do a little bit of more
2 research on when a request was generated to have this
3 added to the defense share, and I'll get back to you.

4 MS. CLARK: Okay.

5 MS. MORRISSEY: But I see it, so what I'm going to do is
6 I'm going to email it to you to make things easier. But
7 I understand your position is, after you review it, if
8 you have additional questions for Mr. Haag, we'll bring
9 him back.

10 MS. CLARK: Yep. Okay. That would be great. And just
11 so that I have an idea, Mr. Haag, the scope of the
12 supplemental report, what does it address?

13 MR. HAAG: It explains the purpose and outcome results
14 of this matter of bad damaged hammer, otherwise new
15 parts, and then some photographs of those working
16 surfaces, similar ones you showed me earlier of a
17 properly surviving hammer and sear versus the damaged
18 one.


19 MS. CLARK: Okay. I think you said the word working
20 surfaces. I apologize. I don't have an understanding
21 of what that means.

22 MR. HAAG: A working sear.

23 MS. CLARK: Oh, working sear. I'm sorry. I
24 misunderstood.

25 MR. HAAG: It's still got its character, shape, angles.

EXHIBIT 6

From: haagfssi@aol.com 
Subject: Luke's Supplemental Report
Date: August 31, 2023 at 2:46 PM
To: ktm@morrisseylewis.com
Cc: michael.haag@comcast.net



Hello Kari.

Mike and I agreed that something needed to be memorialized regarding the odd toolmarks on the broken off sear tip from the evidence trigger.

So that's how this Supplemental Report starts.

Mainly because anyone with serious knowledge of the working of single-action revolvers upon seeing this might incorrectly assume I (we) did not see it. And you can quickly see where such presumed oversight would go from there.

All for now.

Off to our mountain cabin for about a week.
I will have email access while there.

Luke Haag

HAAG SUPPLEMENTAL REPORT 8-31-23.pdf
627 KB



EXHIBIT 7

INTERVIEW WITH: MICHAEL HAAG, DATE: 5/21/2024

MS. CLARK: All right, good morning. It is 9 a.m. Mountain Time on May 21st, 2024. This is the pretrial interview of Michael Haag in the case of State of New Mexico versus Alexander Baldwin. My name is Sara Clark, counsel for Mr. Baldwin, and I'm joined by my colleague Jennifer Stern and Heather LeBlanc for the defense. For the State, I see today we have Ms. Erlinda Johnson, Connor Rice, and Alexander James. And Mr. Haag, can you see and hear me okay?

MR. HAAG: I can.

MS. CLARK: All right, great. Thank you for being here today. So I want to kick this off by asking you a little bit about your background and education as it's relevant for your testimony in this case, if you can provide me sort of a brief overview. And I do have your CV, but kind of if you can point me to the pieces that are relevant here.

MR. HAAG: Sure. The basic idea of firearms mechanisms and functioning is one of the fundamental components of any firearm and toolmark examiner's training. So as far as my specific training in that area, I would say it began at a very early age because, of course, as you know, I grew up with a dad, Luke Haag, in this business as well. So early on, even in grade school, I began

1 about the case? I think you've mentioned a report and
2 videos. So how did those get to you?

3 MR. HAAG: Yeah, that would have been transmitted
4 primarily by either email or thumb drives that were
5 arrived from Special Prosecutor Morrissey.

6 MS. CLARK: Okay. And do you keep those?

7 MR. HAAG: I do.

8 MS. CLARK: Okay. And are they on some kind of share
9 drive? If I wanted to get ahold of those, what would I
10 need to ask for?

11 MR. HAAG: I keep them on an external hard drive here,
12 but I'm more than happy to obviously make a copy. But I
13 think I already did for Ms. Morrissey. At least I
14 copied everything that was my work product. Usually
15 things that come in that are not my work product aren't
16 something I send out as a part of my case file
17 necessarily because I didn't create them. But I'm
18 certainly happy to make a copy of that for you.

19 MS. CLARK: Yeah, I just want to get a sense -- like if
20 I wanted to get a sense of what it is that you actually
21 received to review, are those things that you still have
22 either a collection of or a log of?

23 MR. HAAG: Absolutely. And in fact, the report lists
24 those things as well. In one of the early paragraphs,
25 Luke goes through and lists the things in each of the

1 supplemental reports also if it was relevant to what was
2 obtained.

3 MS. CLARK: Okay. Just so I'm clear, I have two
4 reports. I have one report and a supplemental report.
5 Is there a third report?

6 MR. HAAG: Yeah, I think there were three. That's my
7 recollection.

8 MS. CLARK: Do you know the dates of them?

9 MR. HAAG: Yeah, let me pull them up here. Okay. The
10 primary report looks like August 2nd. Then I have one
11 that is August 26th. And then it looks like August 31.

12 MS. CLARK: What's the subject of the August 31 report?

13 MR. HAAG: It was an examination or a fleshing out of
14 some of the markings on the tip of the sears, I recall
15 here. I'm scrolling through it. And of course, it was
16 published by Luke with me as a tech reviewer, seven
17 pages, including some illustrations, whereas the report
18 from the 2nd, the big one, that's 30 pages, and the 26th
19 is three pages.

20 MS. CLARK: Okay. So August 26, 2023, markings on the
21 sear, seven page with illustrations. Did you provide
22 that to the prosecution?

23 MR. HAAG: It would have been published by Luke,
24 actually, so it wouldn't have been me that supplied
25 that.

1 MS. CLARK: Erlinda, not shockingly, I would like that.

2 MS. JOHNSON: I'm looking for it too. That's -- the
3 August 31st one I have not seen, but we'll track it
4 down. And if we haven't received it from Luke, we'll
5 get it.

6 MS. CLARK: Okay. And I don't want to derail this
7 interview. I want to finish this interview. But this
8 is now the third expert interview where I have found out
9 that there is a report I do not have, and that is a
10 problem. So I'm going to reserve the right to reopen
11 this if I need to, and I'm ask that you guys provide
12 that.

13 MS. JOHNSON: Sure. Not a problem. Alexander, can you
14 check the share drive to see if that August 31st -- I
15 have not seen it. I was just looking for it because I
16 have the other two, but I haven't seen the August 31st
17 one.

18 MR. JAMES: I just double-checked the defense side and
19 the prosecution side, and I do not see an August 31
20 report. So I can go ahead and reach out to Luke and ask
21 him to send that over. That's the best --

22 MS. JOHNSON: Oh, do you have it, Mike?

23 MR. HAAG: I do have it, but Luke, as the original
24 publisher, I'd prefer it if maybe he sends it out
25 because basically I have a copy from him. But he's got

1 the actual one that would -- I don't know if there's
2 sort of an original or not, but he's the publisher.

3 MS. JOHNSON: Okay. Hey, Alex, can you send Luke a
4 quick email, see if maybe he can send it right away?
5 And that's fine, Sara, if you need to talk to Mike
6 again, that's fine.

7 MS. CLARK: Yeah, and I think it'll be the same for Luke
8 if it's his report, since that was not disclosed in his
9 either.

10 MS. JOHNSON: That's fine.

11 MS. CLARK: Okay. So we're going to hold on that report
12 because I don't have it.

13 MR. HAAG: Okay.

14 MS. CLARK: And we will proceed on the others. Okay, so
15 I got myself a little derailed, and since there's not a
16 transcript on this, I'm just going to go back to where I
17 remembered I wanted to be, and we'll go from there. So
18 you received these guns, these firearms, you noted the
19 condition of at least one of them, the pieces and all of
20 that stuff. And I think we were talking about you had
21 -- your understanding of how they got broken or how they
22 ended up in that condition. So can we back up and can
23 you tell me about if you reviewed the FBI report, what
24 you reviewed, and kind of walk me through what your
25 understanding was once you opened those up and why?

1 in today's date of disclosures.

2 MR. JAMES: Yes.

3 MS. CLARK: Thank you. Okay. There we go. All right.

4 So the test -- so you did the second set of testing that
5 you just described with the evidence revolver hammer and
6 otherwise replacement parts for the ones that had been
7 broken. Did you do any other testing on the firearm
8 after that?

9 MR. HAAG: Let's see. With the evidence revolver, let
10 me just review the reports here and make sure I'm not
11 missing anything. I think we've hit the primary aspects
12 of the revolver, just its condition upon receipt, its
13 condition and testing and what values we obtained with
14 replacement parts in it, as well as then with the
15 trigger -- new trigger in it, but the original hammer.
16 I think those are the primary aspects that I can recall.

17 MS. CLARK: Okay. And then the -- August 26th, you said
18 some markings on the sear. I am going to go back and
19 look at that, but just at a high level, can you give me
20 a sense of what you were doing on that third report?

21 MR. HAAG: Yeah, if you look at the pictures that I
22 took, especially through the comparison microscope of
23 that tip of the sear, the part of the evidence sear that
24 would have engaged with the hammer, you certainly can't
25 see any of the original manufacturing marks left on that

1 working surface, basically the part that interacts with
2 the hammer, which isn't surprising considering the
3 hammer full-cock notch is rounded off and the tip of
4 that sear was broken off. So I think that report goes
5 into describing basically the idea that while there are
6 marks there that don't conform to what we would expect
7 for manufacturing marks, because the impactive testing
8 and the damage, there's no way to necessarily know what
9 those marks are from. They're slightly off axis,
10 meaning they're not -- if here's the sear, most
11 manufacturing marks on guns like this are either going
12 to go this way or this way, one way or the other,
13 depending on how they're finished in the process. And
14 the ones in the evidence, as you can see, my pictures
15 are slightly off, but it's entirely possible or even
16 likely that those are a result of the actual impactive
17 damage.

18 MS. CLARK: Okay. But is the -- I guess, is the
19 overarching conclusion at the end of the day, you can't
20 know a hundred percent either way?

21 MR. HAAG: That's correct.

22 MS. CLARK: Or is it different? Okay. All right. And
23 I'll look at that. I haven't had the chance to have a
24 look at that. Any other tests on this firearm or the
25 other Piettas?

EXHIBIT 8

Subject: Fwd: State v. Baldwin - Discovery Disclosed

Date: Wednesday, June 5, 2024 at 6:09:59 PM Eastern Daylight Time

From: Sara Clark

To: Michael Nosanchuk

Begin forwarded message:

From: Kari Morrissey <ktm@morrisseylewis.com>

Date: May 23, 2024 at 4:58:25 AM EDT

To: Sara Clark <saraclark@quinnemanuel.com>, Alexander James <AJames@da.state.nm.us>, Heather LeBlanc <heather@leblanclawnm.com>, Kayla Fleming <kaylafleming@quinnemanuel.com>, Cristina Zuniga <cristinazuniga@quinnemanuel.com>

Cc: Erlinda Johnson <erlinda@erlindajohnsonlaw.com>

Subject: RE: State v. Baldwin - Discovery Disclosed

[EXTERNAL EMAIL from ktm@morrisseylewis.com]

Sara

The failure to disclose the 8/31 supplemental report was mine. The day it was received I intended to forward it for disclosure but I can see from my email that I did not. Out of an abundance of caution Mr. Rice provided you all of the recordings in his possession related to the Gutierrez/Baldwin cases. In this disclosure you received interviews unrelated to the case against your client to include Seth Kenney, Cesar Fort, Chloe Cox, Daniel Trujillo, Emery Chacon, Jeffrey Crow, John Gabriel, Logan Kern, Stub Brambah and Taylor Hohensee. The interview of Mr. Kenney is specific to a separate case against Ms. Gutierrez. These interviews are either specifically related to the involuntary manslaughter case against Mr. Gutierrez or the pending felony case against Ms. Gutierrez for bringing a firearm into a liquor establishment.

There are five interviews relevant to the case against Mr. Baldwin. The interviews of Andy Graham, Cynthia Neidland and Raleigh Wilson were in Mr. Rice's possession but not provided for disclosure until this week. He has been notified that such a delay is unacceptable. The interview of Kristin Gonzales was shared with me by Mr. Rice on March 29, 2024 but it was diverted into my spam folder for some reason I did not see it. We discovered this because I had Mr. Rice send a test dropbox share to my email yesterday and it went into my spam folder. The interview of Ms. Keuhn was shared on February 18 by Mr. Rice to Mr. Taub and we are unsure why it was never uploaded to the server.

Kari

On 05/22/2024 11:09 AM MDT Sara Clark <saraclark@quinnemanuel.com> wrote:

Alexander,

Can you please advise as to when the State received these recordings? Can you please advise also as to when the State received the August 31, 2023, report from Lucien Haag that was provided yesterday?

Regards,

Sara

Sara Clark
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Alexander James <AJames@da.state.nm.us>
Sent: Wednesday, May 22, 2024 12:36 PM
To: Sara Clark <saraclark@quinnemanuel.com>; Heather LeBlanc <heather@leblanclawnm.com>; Kayla Fleming <kaylafleming@quinnemanuel.com>; Cristina Zuniga <cristinazuniga@quinnemanuel.com>
Cc: ktm <ktm@morriseylewis.com>; Erlinda Johnson <erlinda@erlindajohnsonlaw.com>
Subject: State v. Baldwin - Discovery Disclosed

[EXTERNAL EMAIL from ajames@da.state.nm.us]

Good morning,

Please be advised that additional discovery has been uploaded to the defense share folder in the "05.22.2024 Disclosure" folder. Thank you!

Alexander James

Senior Legal Assistant

Complex Crime Unit

First Judicial District Attorney's Office

Santa Fe, NM

(505) 670-5360

This message and any attachments may contain sensitive and confidential attorney work product material. If you are not the intended recipient, please delete this message promptly without further retention or dissemination, unless otherwise required by law. Please notify the sender immediately by separate email or by calling (505) 428-6902. Thank you!

EXHIBIT 9

From: Bryan Carpenter <bryan@13southproductions.com>
Sent: Saturday, April 22, 2023 2:24 PM
To: Kari Morrissey
Cc: Jason J. Lewis
Subject: Re: Rust movie shooting

First blush analysis

I cannot see any reason that's functionally necessary or does not compromise the safety integrity and/or the operation of the gun.

> On Apr 22, 2023, at 2:58 PM, Kari Morrissey <ktm@morrisseylewis.com> wrote:

>

>

> Bryan

>

> Look at the attached pics. the first pic is of the hammer taken by the FBI - the other two are of a brand new hammer from the exact same gun. Compare the notches (especially full cock notch) in these pics and you will see a very stark difference. Can you imagine why this modification would have been made to the gun? The gun was brand new - the difference is not from wear over time and the full cock notch was not damaged by the FBI during testing. Thanks,

>

> Kari

>> ----- Original Message -----

>> From: Kari Morrissey <ktm@morrisseylewis.com>

>> To: "info@emf-company.com" <info@emf-company.com>

>> Cc: "Jason J. Lewis" <jjl@jjllaw.com>

>> Date: 04/20/2023 9:54 AM MDT

>> Subject: Rust movie shooting

>>

>>

>> Good Morning

>>

>> My name is Kari Morrissey and I am one of the Special Prosecutors on the case involving Alec Balwin and Hannah Gutierrez-Reed in New Mexico. I understand that the gun used in the fatal shooting of Halyna Hutchins was purchased from EMF on September 29, 2021. The gun was a Pietta 1873 Californian 45LC. I have some questions concerning the original condition of the gun at the time you sold the gun to the prop house that supplied it to the movie set.

>>

>> I have attached three photos for your review. The first photo is of a the hammer of the gun used in the shooting of Ms. Hutchins. You can see that the hammer appears to be silver/chrome rather than the blue/black metal of the rest of the gun. Moreover, the full cock notch of the hammer appears to have been filed off. The next two photos are of the hammer of a band new unused gun of the exact same model. The hammer of the comparison gun is the same blue/black metal as the rest of the gun and the hammer notches are fully pronounced.

>>

>> You may notice that the sear in the first photo is broken. I am not concerned about the broken sear as that occurred during forensic testing at the FBI lab.

>>

>> I am trying to determine whether the hammer of the gun was modified after you sold it to the prop supplier. Can you speak to me about this issue? Thank you.

```
>>  
>> Kari Morrissey  
> <image0[1].png>  
> <image3[5].jpeg>  
> <image4[2].jpeg>
```


EXHIBIT 10

From: Bryan Carpenter <bryan@13southproductions.com>
Sent: Sunday, April 23, 2023 5:42 AM
To: Kari Morrissey; Jason Lewis
Subject: Re: Emails

Follow up on yesterday's discussion.

Though I see no reason (operationally) why that modification exists, it remains to be seen definitively if it compromised the safety and function of the revolver and who/where/why it was preformed in the first place.

I look forward to finding those answers.

b

Sent from my iPhone

On Apr 22, 2023, at 6:31 PM, Jason J. Lewis <jjl@jjllaw.com> wrote:

Got it this time. Thanks.

LAW OFFICE OF JASON J. LEWIS, LLC

JASON J. LEWIS
Attorney

1303 Rio Grande Blvd. NW, Suite 5
Albuquerque, NM 87104
505.361.2138 | 505.214.5108 (f)

From: Bryan Carpenter <bryan@13southproductions.com>
Sent: Saturday, April 22, 2023 4:07 PM
To: Jason J. Lewis <jjl@jjllaw.com>
Cc: Kari Morrissey <ktm@morrisseylewis.com>
Subject: Re: Emails

Resending the below, don't know if it went through or not. Bad service pretty much anywhere in Mississippi!

On Apr 22, 2023, at 4:35 PM, Bryan Carpenter <bryan@13southproductions.com> wrote:

Even if they were modifying it for some type of "fanning" operation as Baldwin previously mentioned, the difference in speed would be negligible (100th of a second).

You would also get the same affect by just holding the trigger down. But anything is certainly possible with this crew.

I'll give it a glance and see if I can highlight anything specific. Unless it's a listed gag, a lot of that stuff is just ad lib between the actors/armorer/director and stunt coordinator.

Any way you look at it though it's sketchy as hell.

Gut instinct at this point is there's been a lot of lies told.

On Apr 22, 2023, at 3:49 PM, Jason J. Lewis <jjl@jjllaw.com> wrote:

Can you think of any reason why this kind of modification might've been made? Do you know if this would this make it easier to "fan" the gun? I wonder if it might be worth our while to look through the script to see if it calls for any trick shots, etc., that might've been the reason for the modification.

J

LAW OFFICE OF JASON J. LEWIS, LLC

JASON J. LEWIS
Attorney

1303 Rio Grande Blvd. NW, Suite 5
Albuquerque, NM 87104
505.361.2138 | 505.214.5108 (f)

From: Bryan Carpenter <bryan@13southproductions.com>

Sent: Saturday, April 22, 2023 1:51 PM

To: Kari Morrissey <ktm@morrisseylewis.com>

Cc: Jason J. Lewis <jjl@jjllaw.com>

Subject: Re: Emails

Direct answer.... no....it is not common for the reason of actor handling, but it is common for making them capable of firing blanks, but only semi auto, auto, etc. not SAA revolver and similar like the one in question.

Movie fire arms are heavily modified. The more complex the operating system, the more modifications are necessary. These modification are for functionality, and not for ease of use. Single action army type firearms are commonly not modified as they do not require anything to fire blanks (they are simple operating systems). The only reason for one to be modified would be for some type of trick, shooting, etc. The average single action trigger pull on them is around 2.5 pounds. This is extremely light and they are pretty easy to cock as well, so aside from the above I don't know why any modifications would've been necessary.

On Apr 22, 2023, at 2:27 PM, Kari Morrissey
<ktm@morrisseylewis.com> wrote:

Bryan

Can you also answer the following question - is it common that armorers modify guns and make them "movie ready" by modifying the hammer, etc., to make them easier for the actors to handle? Thanks,

Kari

On 04/22/2023 10:06 AM MDT Bryan
Carpenter
<bryan@13southproductions.com>
wrote:

Happy Saturday as well!

Will do

I'll scan through the emails and forward anything pertinent along with some bullet points to discuss when y'all are ready.

On Apr 22, 2023, at
10:04 AM, Jason J.
Lewis <jjl@jjllaw.com>
wrote:

Hey Bryan -

Happy Saturday. I am following up on our conversation last week where you mentioned you had sent some emails to the previous team raising issues you thought needed to be looked into/addressed. If these are things you still think are valid and need to be researched, let us know what they are. We now have some breathing room to start digging into things, so shoot over

whatever ideas you've
got.

Thanks,

Jason

LAW OFFICE OF JASON J. LEWIS,
LLC

JASON J. LEWIS
Attorney

1303 Rio Grande Blvd. NW,
Suite 5
Albuquerque, NM 87104
505.361.2138 | 505.214.510
8 (f)

EXHIBIT 11

From: Sara Clark saraclark@quinnemanuel.com

Subject: RE: Defense Share

Date: May 1, 2024 at 6:06 PM

To: Kari Morrissey ktm@morrisseylewis.com, Erlinda Johnson erlinda@erlindajohnsonlaw.com

Cc: Heather LeBlanc heather@leblancclawnm.com, Cristina Zuniga cristinazuniga@quinnemanuel.com, Alex Spiro alexspiro@quinnemanuel.com, Alexander James AJames@da.state.nm.us

SC

Thank you, Kari, I will keep an eye out.

Best,
Sara

Sara Clark

Associate,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Kari Morrissey <ktm@morrisseylewis.com>

Sent: Wednesday, May 1, 2024 4:59 PM

To: Sara Clark <saraclark@quinnemanuel.com>; Erlinda Johnson <erlinda@erlindajohnsonlaw.com>

Cc: Heather LeBlanc <heather@leblancclawnm.com>; Cristina Zuniga <cristinazuniga@quinnemanuel.com>; Alex Spiro <alexspiro@quinnemanuel.com>; Alexander James <AJames@da.state.nm.us>

Subject: RE: Defense Share

[EXTERNAL EMAIL from ktm@morrisseylewis.com]

Sara

I have a meeting with Detective Hancock scheduled tomorrow to address your discovery requests that apply to the SFSO. Moreover, Mr. James, myself and Ms. Johnson are being granted full access to the defense share tomorrow morning (or so I'm being told) so that we can meet and confer with you in a manner that will be meaningful and we can solve any remaining issues without relying on Mr. Bowe. Mr. Bowe had surgery recently and as a result has been less than responsive to my requests. I will update you tomorrow and we can schedule a zoom meeting with Mr. James and we can meet and confer. I intend to have your discovery requests as they relate to the DA's office and special prosecutors fulfilled by close of business Monday.

Kari

On 05/01/2024 1:10 PM MDT Sara Clark <saraclark@quinnemanuel.com>

wrote:

Kari,

The State's unwillingness to discuss these issue only increases our concerns. I reiterate our request to have a meaningful conferral to address these issues and hear from the state how it intends to ensure compliance in light of the concerns I raised below (including what appear to be frankly logistical matters that both parties should have an interest in resolving efficiently).

However, as I understand you remain unwilling to speak, please see the below:

1. Please respond to my first request regarding population of the share folder going forward.
2. Please identify the document and its origin for the following: 20221102092239282; 20221102092347320 (including the handwriting on the same); 20221102092415569; 20221102122413395 (including the handwriting on the same).
3. Please advise where on the share site or otherwise we can find the documents referenced in your response to our request No. 24 (regarding communication and documents exchanged with Mr. Carpenter) of our April 17, 2024 letter, which the State represented have been previously provided.
4. Please advise as to the status of your inquiry in to the 10/21/23 misc folder and whether there will be additional materials from this folder uploaded, as we have yet to see that. Please provide the date the state became aware of the materials in that folder.
5. Please advise whether you will accept service of subpoenas to the individuals you have designated as experts.
6. Please advise as to the contents of the Verizon CD the state was alerted to by the Court on July 5, 2023, whether that has been provided to the defense, and if so, where those materials can be located on the defense share.
7. Please advise as to the status of the collection of materials from Cpl Hancock, and when you anticipate responding to the requests you have forwarded.
 - a. Please separately advise as to the status of the collection of text messages and communications from Cpl. Hancock. These materials are material to the defense, within the state's possession, and should be provided without delay pursuant to Rule 5-501(A)(3). *See State v. Ortiz*. 146 N.M. 873, 879-80 (N.M.

Ct. App. 2009)

Regards,
Sara

Sara Clark

Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Kari Morrissey <ktm@morrisseylewis.com>
Sent: Wednesday, May 1, 2024 8:26 AM
To: Sara Clark <saraclark@quinnemanuel.com>; Erlinda Johnson <erlinda@erlindajohnsonlaw.com>
Cc: Heather LeBlanc <heather@leblanclawnm.com>; Cristina Zuniga <cristinazuniga@quinnemanuel.com>; Shadrick Bowe <SBowe@da.state.nm.us>; Alex Spiro <alexspiro@quinnemanuel.com>
Subject: RE: Defense Share

[EXTERNAL EMAIL from ktm@morrisseylewis.com]

Sara

We are working to address any outstanding discovery issues as quickly as possible. I provided you the "documents" folder out of an abundance of caution to ensure you have all of the discovery that we have. It appears that you were already in possession of many of those documents. I will not be reviewing all of these documents to answer your questions concerning handwritten annotations. If you have specific concerns about a document you can email it to me and I can try to address it. We have continued to disclose discovery as we are required to do under the rules and will continue to take steps to ensure that all remaining discovery issues are addressed.

Kari

On 04/30/2024 9:17 PM MDT Sara Clark
<saraclark@quinnemanuel.com> wrote:

Good evening Kari,

We are following up on the below files and the overarching discovery concerns. We note we have still been unable to locate the 10/21/23 file folder.

We would propose, as an initial matter, that anything further loaded into the defense share site from today (other than the PTI and FBI materials, whose folders we can follow) be loaded into a segregated folder on the Share site (e.g., "Materials from 5.1.24 forward" or something like similar so that we can readily identify what is new). We consider this a fair and reasonable proposition at this point.

Second, the new "Documents" folder appears to be populated with documents "modified" November 2022, but that we understand were provided three days ago. Some of these documents appear to be copies of others we already have—others appear to contain handwriting or other annotation. Please identify for the defense the origin of these documents.

Finally, we note that the above does not resolve our ongoing concern that there appear to be materials that are not timely provided (or not provided at all) to the defense that ought to be. We note that in our last discussion it appeared that you are not familiar with the structure or content of the defense share site, though I understand from our conversation that you are now aware that the site does not appear to mirror your own files in a way that allows you to ascertain whether and when materials are being provided. This is substantial concern for the defense, in particular in light of the state's assertions regarding what the defense does and does not have access to. Please let us know how the State intends to address these issues, which have now come to a head in at least two interviews.

As ever, we remain available for a constructive meet and confer to walk through any of these issues in order to achieve a more efficient resolution than perhaps can be had by email. We of course reserve all rights to seek appropriate remedies if the State fails to correct these issues.

Regards,
Sara

Sara Clark
Associate,
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From: Sara Clark
Sent: Monday, April 29, 2024 3:40 PM
To: ktm@morrisseylewis.com; Erlinda Johnson
<erlinda@erlindajohnsonlaw.com>
Cc: Heather LeBlanc <heather@leblanclawnm.com>; Cristina Zuniga <cristinazuniga@quinnemanuel.com>; Shadrick Bowe
<SBowe@da.state.nm.us>; Alex Spiro
<alexspiro@quinnemanuel.com>
Subject: Defense Share

Kari,

I had to drop from the prior line, but Cristina noted to me that you mentioned a file folder called "Misc disclosure – 10/21/23" and an "EMF folder."

I am sharing below what I can see on my end. When I searched that folder name (several variations) I got no hits. I am not confident the search function works very well. For the moment, though, I cannot see the folders you are referencing. I have also searched our internal system for the Supplemental Haag Report and do not see it. At this time, I am concluding we did not get that report, and that I do not have access to the folders you are referencing (misc and EMF).

I would like to work through this issue sooner rather than later. It seems like working through it with Shad alone is not getting us there. Please let me know how you want to proceed. I am happy to get on a screen share and dig around/be directed to what I am supposed to be seeing, but with the information I have, I do not have access.

Best,
Sara

 Name ▾

Modified ▾

 11-Expert Curriculum Viteas









































 March 9, 2023





































 14-Media























 March 9, 2023

 15-Baldwin Instagram and Social Media

 March 9, 2023

 16-Civil Complaints	 March 9, 2023
 17-Location Agreement- Bonanza Creek and Rust Productions	 March 9, 2023
 18-New Mexico Film Office Project Registration	 March 9, 2023
 19-AMG Law	 March 9, 2023
 1-SFSO Investigation	 March 9, 2023
 20-DA Investigation	 June 28, 2023
 2-FBI Laboratory Analysis and Report	 March 9, 2023
 3-OMI and Toxicology	 March 9, 2023
 4-RCFL Forensic Analysis	 March 9, 2023
 6-OSHA	 March 9, 2023
 7-Forensic Analysis of A_Baldwin's Cell	 March 9, 2023
 8-Script and Script Report	 March 9, 2023
 ABC Baldwin	 January 8
 Ballistics Photos	 January 29
 Ballistics testing and Gutierrez text	 January 8
 Bowles letter to Ms. Carmack-Altwies	 January 8
 Bullet Photos SFSO Viewing	 January 8
 Bullhead City Report	 January 8
 CDR Photos 005-00254	 January 8
 Church Diagram	 January 8

 Closing Conference Ryan Smith	 January 8
 Court First Appearance Hannah Gutierrez	January 8
 Documents	 3 days ago
 Enhanced Images, Encrypted information	 January 8
 FBI Documents - Case Report	 March 21
 Final Haag Illustrated Report	 January 8
 Gosset with Exhibits	January 8
 Gutierrez Holding Revolver	 January 8
 Gutierrez Schedule plus 3 letters re Bowles	 January 8
 Halls and Zachry Proffers	 January 8
 Kenny Recorded Statement	 January 8
 Kenny, Luper and others text messages	 January 8
 LeicaScan	 January 17
 LeniCalas-Credits_ExpertSupplemental	 February 13
 Location Agreement, State Agreement and Vigil e-mail	 January 8
 Medford to Mortenson Interviews	 January 8
 MikePremeauCanceledPTI	 January 17
 Pretrial Interviews	 January 16
 Primeau case file	 February 13

 Rust Prod. SDT and DA Response	 January 8
 SDT's KOB, Christus, Rust Prod, ABC, Prod. Outfitters	 January 8
 SFSO Haag fired .45 colt cartridge	 January 8
 Souza Interview (7), Allred images, initial rust items	 January 8
 Starline Brass Ammo	 January 17
 Stream but no able to open	 January 8
 Teske, Guitierrez PTI, Sarah Texts	 January 8
 Thell Reed 4.7.23	 January 8
 Voice mail Thell Reed to Seth Kenny plus Hawks e-mails	 January 8
 Zachry Cooperation Agreement	 January 8
 AvigilonControlCenterPlayerStandAlone-6.14.4.6.exe	 March 24, 2023

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