

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 09-00296-01/06-CR-W-FJG
	)	
<b>JOHN B. ANGELL ET AL.,</b>	)	
	)	
Defendant.	)	

**NOTICE OF INTENT TO USE EXPERT WITNESSES**

Comes now the United States of America, by Matt J. Whitworth, United States Attorney, and Jeffrey Valenti, Assistant United States Attorney, both for the Western District of Missouri, and informs the defendants that it will seek to introduce expert testimony from the below-listed individuals on a variety of topics, for which a concise summary of the proposed testimony for each witness is provided.

1. Steve Cook

Detective for the Independence, Missouri Police Department. Detective Cook has extensive background in the investigation of Outlaw Motorcycle Gangs (“OMG”) and has specifically investigated the El Forastero and Galloping Goose Outlaw Motorcycle Gangs for many years. Detective Cook will discuss these groups’ organizational structure, the origin of the groups, the meaning of the patches and clothing they wear, the slang terminology they use regarding drugs and cooperating witnesses, commonly referred to as snitches, and finally will discuss the respective defendant’s role or roles within the group.

2. Chris Omodt

Captain with the Hennepin County, Minnesota Sheriff's Office. Captain Omodt has extensive background in the investigation of drugs and Outlaw Motorcycle Gangs and has specifically investigated the El Forastero and Hell's Angels Outlaw Motorcycle Gangs for many years. Captain Omodt will discuss these groups' organizational structure, the origin of the groups, the meaning of the patches and clothing they wear, the slang terminology they use regarding drugs and cooperating witnesses, commonly referred to as snitches, and finally will discuss the respective defendant's role or roles within the group.

3. Fred Larsen

Forensic Chemist for the Independence, Missouri Police Crime Laboratory. Mr. Larsen will testify about the manner in which controlled substances are identified in the laboratory. Additionally, he will identify precursor materials, equipment and paraphernalia used in the manufacture, distribution and use of methamphetamine.

4. Jeff Seever

Detective with the Independence, Missouri Police Department. Detective Seever will testify about the manner in which methamphetamine was being manufactured in this area in the 1990s and will also discuss the chemicals necessary for its manufacture. Detective Seever will further discuss the common ways in which methamphetamine is ingested, distributed and what effect it has on the user/abuser. Finally, Detective Seever

will testify about the investigative techniques employed to combat the clandestine manufacture of methamphetamine.

Respectfully submitted,

Matt J. Whitworth  
United States Attorney

By */s/ Jeffrey Valenti*

Jeffrey Valenti  
Assistant United States Attorney

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on November 18, 2009, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

*/s/ Jeffrey Valenti* \_\_\_\_\_  
Jeffrey Valenti  
Assistant United States Attorney