

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

|                           |   |                                   |
|---------------------------|---|-----------------------------------|
| UNITED STATES OF AMERICA, | ) |                                   |
|                           | ) |                                   |
| Plaintiff,                | ) |                                   |
|                           | ) |                                   |
| v.                        | ) |                                   |
|                           | ) | No. 10-00162-03/06/07/16-CR-W-FJG |
| SHAWN HAMPTON,            | ) |                                   |
| a/k/a "Smoke",            | ) |                                   |
|                           | ) |                                   |
| NARICCO T. SCOTT,         | ) |                                   |
| a/k/a "Rico"              | ) |                                   |
|                           | ) |                                   |
| CALAH D. JOHNSON,         | ) |                                   |
| a/k/a "Green Eyes"        | ) |                                   |
|                           | ) |                                   |
| THEODORE S. WIGGINS,      | ) |                                   |
| a/k/a "Theo"              | ) |                                   |
|                           | ) |                                   |
| Defendants.               | ) |                                   |

**GOVERNMENT'S NOTICE OF EXPERT WITNESSES**

Comes now the United States of America, by and through its undersigned attorneys, and respectfully notifies the Court and counsel of its intent to call the following expert witnesses at trial.

**EXPERT TESTIMONY**

The Government may call the following persons as experts to testify in the subject areas indicated.

1. **Andrew G. Atkinson, Forensic Specialist IV**  
Kansas City, Missouri Police Department Criminalistics Laboratory

Subject area: Mr. Atkinson's area of expertise is DNA analysis. He will testify consistently with Kansas City, Missouri Police Department Crime Laboratory Report #2 in case # 10-034242, that Naricco Scott is a possible contributor to a mixture of DNA recovered from a plastic bag recovered by police on May 9, 2010.

2. **Seth A. Cooper, Forensic Specialist IV**  
Kansas City, Missouri Police Department Criminalistics Laboratory

Subject area: Mr. Cooper's area of expertise is forensic chemistry. He will testify consistently with Laboratory Report #1 in case number 10-034242 that the substances recovered by police contained cocaine base.

3. **Jennifer L. Howard, Forensic Specialist IV**  
Kansas City, Missouri Police Department Criminalistics Laboratory

Subject area: Ms. Howard's area of expertise is DNA analysis. She will testify consistently with Kansas City, Missouri Police Department Crime Laboratory Report #26 in case # 09-052799, that Calah Johnson is the source of the majority of DNA recovered from a .45 caliber Glock recovered by police on March 7, 2010.

4. **Gregory S. Hummel, Chief Criminalist, DNA Section**  
Kansas City, Missouri Police Department Criminalistics Laboratory

Subject area: Mr. Hummel's area of expertise is DNA analysis. He will testify consistently with Kansas City, Missouri Police Department Crime Laboratory Report #3 in case # 10-016444, that Calah Johnson's genetic profile was developed from a buccal swab collected by police on March 7, 2010.

5. **Jarrah R. Kennedy, Forensic Specialist III**  
Kansas City, Missouri Police Department Criminalistics Laboratory

Subject area: Ms. Kennedy's area of expertise is DNA analysis. She will testify consistently with Kansas City, Missouri Police Department Crime Laboratory Report #7 in case # 08-057798, that Naricco Scott is a possible contributor to a mixture of DNA recovered from the .45 caliber revolver recovered by police on May 9, 2009.

6. **Robert J. Smith, Forensic Specialist III**  
Kansas City, Missouri Police Department Criminalistics Laboratory

Subject area: Mr. Smith's area of expertise is firearms and toolmark examination. He will testify consistently with Laboratory Report #7 in case number 09-052799, that the firearms were test-fired and functioned properly, and that none of the firearms were manufactured in the state of Missouri.

7. **Detective Don Stanze**  
Kansas City, Missouri Police Department

Subject area: Narcotics trafficking. His testimony will encompass how cocaine base is manufactured, transported, and sold, trafficking versus user amounts of cocaine base, weights (including conversion of ounces to grams) typically sold, dollar values, and the role of guns in drug trafficking.

Resume: Forthcoming.

8. **David E. Travis, II, Forensic Specialist V**  
Kansas City, Missouri Police Department Criminalistics Laboratory

Subject area: Mr. Travis's area of expertise is forensic chemistry. He will testify consistently with Laboratory Reports #2, #3, #4, #9 in case number 09052799, Report #1 in case number 090603817, and Report #1 in case number 10-027099, that the substances recovered by police contained cocaine base.

9. **Larry B. Washington, Forensic Specialist IV**  
Kansas City, Missouri Police Department Criminalistics Laboratory

Subject area: Mr. Washington's area of expertise is forensic chemistry. He will testify consistently with Laboratory Report #1 in case number 10-030882 that the substances recovered by police contained cocaine in the salt form.

10. **Matthew B. Wilson, Special Agent**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subject area: Mr. Wilson's area of expertise is firearms' classification. He will testify consistently with Report #31 in investigation number 779070-10-0019, that none of the firearms were manufactured in the state of Missouri.

Respectfully submitted,

Beth Phillips  
United States Attorney

By */s/ Brent B. Venneman*

Brent B. Venneman  
Assistant United States Attorney

By */s/ Sydney Sanders*

Sydney Sanders  
Assistant United States Attorney

Charles Evans Whittaker Courthouse  
400 East 9th Street, Room 5510  
Kansas City, Missouri 64106  
Telephone: (816) 426-2605

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on this 6th day of January, 2012, to the Electronic Filing System (CM/ECF) of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

**Daniel J. Ross**

Daniel Ross, LLC  
600 E. 8th Street  
Ground Floor, Suite A  
Kansas City, MO 64106

**Robin D. Fowler**

Bath & Edmonds, P.A.  
7944 Santa Fe Drive  
Overland Park, KS 66204

**Kurt D. Marquart**

911 Main Street, Ste. 2910  
kansas City, MO 64105

**Michael W. Walker**

Duchardt & Walker, LLP  
5545 N. Oak Trafficway, Ste. 8  
Kansas City, MO 64118

*/s/ Brent B. Venneman*

---

Brent B. Venneman  
Assistant United States Attorney