IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
COURT, IN AND FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs. Case No.: 48-2011-CF-015217-O

DIVISION: 16

STEVEN FRANK MEAD,

Defendant.

DEPOSITION OF JANINE ARVIZU
July 15, 2013
11:34 a.m.
at the Offices of
KATHY TOWNSEND COURT REPORTERS
110 Twelfth Street, NW
Albuquerque, New Mexico 87102

PURSUANT TO THE FLORIDA RULES OF CIVIL PROCEDURE, this deposition was:

TAKEN BY: MS. LISA GONG
ATTORNEY FOR THE PLAINTIFF

REPORTED BY: DENISE KOPAN, CCR #124
KATHY TOWNSEND COURT REPORTERS
110 Twelfth Street, NW
Albuquerque, New Mexico 87102

A P P E A R A N C E S

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E X H I B I T S

(None)

MS. GONG: Good afternoon. I am Lisa Gong. And we have also David Fear here in the room with me today. D-a-v-i-d, F-e-a-r.

JANINE ARVIZU
after having been first duly sworn under oath, was questioned and testified as follows:

EXAMINATION

BY MS. GONG:

Q. Ms. Arvizu, I know we have been at deposition in another case in January and I don't recall if I got your CV from that deposition or not.

Do you remember sending it to me?

A. I don't. I will get your e-mail address from the court reporter and send you one, though.

Q. Okay. If you can. I would appreciate that.

Can you just please tell us, what is your current occupation?

A. I am a quality assurance consultant and a certified quality auditor and I provide data quality assessments for users of laboratory results.

Q. And how long have you been doing that for?

A. Many years. I guess I started doing quality assurance work decades ago. I guess I got into it on a very directed basis probably 20 years ago.

Q. Okay. Let me ask you, can you just tell us

briefly about your educational background?

A. Sure. I have a BS degree in biochemistry from California Polytechnic State University at San Luis Obispo and an ABD in chemistry from the University of New Mexico, which is not a degree, it's an indication of "all but dissertation." It means completion of all the course work, examinations, proposal preparation and defense required for admission to candidacy for a Ph.D. degree, but I did not defend my dissertation.

And --

Q. Can you do your dissertation now if you decided you wanted to finish up the Ph.D.?

A. I'm sorry, I missed the first part of your question.

Q. If you decide that you do want that Ph.D., can you go back and defend your dissertation?

A. Now?

Q. Yes, right now.

A. I don't know. I don't think so. I guess I have never considered it.

Q. I was just curious. I was just curious.

And, I'm sorry, before I interrupted you, what were you about to say?

A. I am certified as a quality auditor by the

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American Society for Quality, which is the professional organization of quality practitioners.

Q. And when were you certified?

A. I am not sure when I first got my certification. There is a recertification process that happens every three or four years. And I have been doing it for some time. I am really not sure of when the first time I did it was. Probably in the '90s sometime.

Q. And what did you have to go through?

What types of training or experience did you need to get that certification?

A. There are essentially three things that you have to do, if I recall, and that is have a certain number of years of experience as a practicing professional in the field, have an underlying academic degree in the relevant field, and sit for an examination, which is like an all-day examination that covers the contents of the body of knowledge for practicing quality auditors. And it's not a "give me." At the time I took it, about a third of the people who took it failed it.

Q. Okay. And now, the quality assurance work you do, do you do it as your own business?

A. Yes, as an independent consultant.

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Q. Do you also have another part-time or full-time job in addition to that?

A. I do. I am currently employed as a program manager for the Water Utility Authority. I am currently out on medical leave because I apparently tore my ACL.

Q. I'm sorry to hear about that.

When are you expected to go back to work?

A. I don't actually know because I can't get in to see the orthopedic surgeon until August. So I don't know yet.

Q. Okay. Have you ever testified as an expert witness in a criminal trial?

A. Yes.

Q. And in what areas?

A. In the field of quality assurance related to analytical measurements. So it's been everything from sampling through lab work through data reporting. And in the field of forensics, everything from toxicology to gunshot residue to controlled substance testing to ballistics to fingerprints.

Q. And I think you also testified in regard to lethal injection protocols, too, correct?

A. I did. I did quality assurance review of standard operating procedures related to the lethal

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injection protocols.

Q. And --

A. I don't remember if -- it wasn't -- I remember doing depositions. I don't know that I actually testified in a hearing or in those cases, but I remember doing affidavits.

Q. Okay. And in the area of blood alcohol testing as it relates to blood, how many times have you testified as an expert in a hearing or trial?

A. I have not counted them up that way, but I would estimate in a couple of dozen maybe at the most.

Q. Has it all been in Florida or all around the country?

A. All around the country.

Q. And have you ever testified for the State in that area?

A. I have not.

Q. Now, when you testified in those times in the scientific areas, did you ever testify that any of that particular science was faulty or unreliable, or did you just testify to the procedure of obtaining those samples and the procedure of the testing, itself?

A. I want to make sure I understand your question. When you refer to "those times," are you referring to only blood alcohol, or all my testimony?

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Q. All your testimony.

A. Okay. Now I need to understand what you mean by was I talking about problems with the science. You said -- you gave me like two options, was I testifying about problems with the science or the quality issues, validity and so forth. Method validity actually speaks to the quality of the scientific method. So I am not sure I know how to answer your question.

Q. Well, did you testify in regard that, for example, a fingerprint was reliable, or unreliable type of science, or did you testify to the process and procedure of obtaining the fingerprint and how it went through testing and the procedural aspect of it?

A. Okay. I guess my answer is both, because I have testified that the scientific conclusions from a particular method were not valid and I have testified to the weaknesses, in particular -- actually, the performance of methods that render results unreliable.

So I am not sure if that's what you are asking me. I am struggling a little bit understanding what you mean when you talk about science that generically, but I -- for example, I do not testify that the technique used for blood alcohol, that is, gas chromatography, is an unreliable scientific method. That is never my testimony. The technique of gas

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chromatography is a robust, well-understood, scientific method. It is the application of that method that may or may not be done in a scientifically valid and reliable method.

Q. Okay. And that is the same of all of the other fields of science that you testified in, right?

A. I am having -- I am thinking to be sure. Yes, I think when I have addressed the issue of science at a high level, it's generally related to the fact that the technique being used, the analytical method being used, has not been scientifically valid and shown to be appropriate for its intended use.

Q. And when you said gas chromatography was a robust science, do you mean that it's reliable?

A. It is well-documented, it is well-understood. It has the potential to be, if properly implemented, a very, very effective analytical technique, yes.

Q. Okay.

A. But it doesn't mean that everything that's done with a gas chromatograph is necessarily valid and reliable.

Q. Okay. Now, in regard to blood alcohol testing, have you ever tested yourself any blood samples for traces of alcohol?

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A. No.

Q. When was the last time that you actually were an analyst and tested samples in a lab?

A. It's been decades.

Q. Okay. Have you ever reviewed any blood tests that were retested by the defense against the result obtained by the State?

A. Have I ever -- I have never been provided with the what I will call "discovery," especially the underlying foundational data associated with a defense retest result. So no.

Q. Okay. So you have never even seen any set of data as far as you recall?

A. I do not.

MR. SNURE: Well, hold on a second. Lisa, this is a twist on what she was asked, but I want you to be aware of it. The State has tested a separate sample in a case I have in Lake County and we have looked at the first sample. And when I get the lab records, we are going to look at the second sample. So even if it hasn't happened yet, it may happen by the time we get to court on this and you just need to be aware of it.

MS. GONG: Okay. Do you know the case number of that?

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MR. SNURE: No.

MS. GONG: Lake County. And is it a 2012 or 2013 case?

MR. SNURE: I think it's a 2010 case.

MS. GONG: Okay. Can you give it to me later? I know you don't know it right now.

MR. SNURE: Sure.

MS. GONG: Okay. And Ms. Arvizu is also your expert witness in that case?

MR. SNURE: Yes.

MS. GONG: Okay.

Q. (By Ms. Gong) Now, have you ever published any journals or literature?

A. I have. If you are asking related specifically to the field of quality assurance, I wrote the quality standard that served as the basis for the U.S. Navy's evaluation and approval of testing laboratories, both commercial and governmental.

Q. And when was that written or published?

A. You know, I don't remember. I think -- I'm going to guess it was the late '90s.

Q. And what did you --

A. That's a guess.

Q. What did you mean when you said that it served as a basis for the U.S. Navy's program? I'm

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sorry, I didn't catch that?

A. Sure. Analytical laboratories that did testing work for the U.S. Navy, this essentially -- this document essentially set the ground rules. And I managed the program that evaluated labs that wanted to do work to see whether they were qualified and whether they met the requirements of that standard. And then once they were approved in doing work, then we, on an ongoing basis, evaluated the quality of their work.

Q. Did you also, in May of 2000, author an article for the Champion titled "Forensic Labs: Shattering the Myth"?

A. I did.

Q. And that was for the National Association of Criminal Defense Lawyers magazine?

A. Yes.

Q. And you also travel to teach at seminars and to classes, as well, correct?

A. I do.

Q. Do you often lecture at the National Association of Criminal Defense Attorneys?

A. I don't know what you consider "often." I know that I have on several occasions over the years.

Q. When was the last time that you lectured for them?

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A. It was in Cleveland, I believe. I am not sure how long ago. Maybe a year-and-a-half ago.
Q. Okay.
A. I am not sure, but you could look on-line and find it, I am sure.
Q. Have you ever worked in a crime laboratory or a forensic laboratory?
A. No.
Q. Have you ever received any training in alcohol testing or forensic alcohol testing?
A. No.
Q. Have you ever done any forensic alcohol testing?
A. No.
Q. Have you ever done any blood testing?
A. No.
Q. Now, what types of materials did you review for this case?
A. The discoverable materials that were provided to me by Mr. Snure's office, they were sent to me electronically.
Q. Did you review any police reports?
A. No.
Q. Did you review any witness statements?
A. No.

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Q. Did you see any photographs or videos in this case?
A. No.
Q. Did you talk to any witnesses?
A. No.
Q. What kind of materials were provided to you by Mr. Snure's office?
A. It's all materials relating to the blood sample and its testing by the laboratory, the foundational records that essentially support their conclusion.
Q. The records from FDLE?
A. Yes.
Q. Does that include their bench notes and the underlying data that they used?
A. Yes.
Q. Have you ever done any audits of any Florida Department of Law Enforcement laboratory?
A. Only data audits of reported results, not an on-site audit of the laboratory.
Q. And "data audits" meaning like this case, correct?
A. Yes.
Q. And have you ever visited any FDLE laboratories?

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A. I have. I visited the lab in Orlando.
Q. During your Orlando visit, what specific areas inside FDLE were you privileged to go to?
A. A conference room. I did not enter the actual analytical part of the laboratory. I met with people from the lab in a conference room.
Q. Did you research any literature or journals while working on this case?
A. Research any literature or journals, no.
Q. And what issues or deficiencies did you find in this case regarding the FDLE regulations?
A. Regarding the FDLE regulations?
MR. SNURE: Well, you need to keep in mind, Lisa, that the motion pending deals with the insufficiency of the regulations. It would be the same testimony. In any case, it doesn't have anything to do with this case except that she is going to comment on it.
Q. (By Ms. Gong) Well, I just want to know if there is anything specific to this case that you noted or observed that I should know about.
A. Nothing different in this particular case. Nothing unique to this particular case, I suppose, if that's what you are asking.
MR. SNURE: No, no. That's a bad answer to a

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bad question.
THE WITNESS: Oh, okay. I don't understand the question. I'm sorry.
MR. SNURE: There are deficiencies in the materials that we received in this case that she can identify for you.
THE WITNESS: Yes.
MR. SNURE: The motion --
MS. GONG: Well, I think, you know, Mike, she is giving a deposition right now. So --
MR. SNURE: I know. But I'm going to tell you right now, we are going to confuse the answer if you don't let me address the two. The issues related to this case are dependent upon the data that was received. And so if you want to place it in that way, you'll get the answers you are looking for.
MS. GONG: Okay.
Q. (By Ms. Gong) The data that you received in this case, what issues or deficiencies did you note?
A. I'm sorry, but your previous question about the regs really confused me. There were a number of issues with -- that affect the usability of the results in this case. And they relate to sample integrity, they relate to method validity, and they relate to the reliability of the work that was done in the case.

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Q. You identified three areas?
A. I'm sorry, what was the first part of that question?
Q. So you just identified for me three areas?
A. Yes.
Q. Can you briefly explain each area?
A. Sure. The first area is sample integrity. And that is ensuring that each measurement result that is reported by a laboratory is generated by measuring a sample that has integrity; that is, that we are really confident, because of the way that that sample was identified and collected and packaged and transported and stored and ultimately analyzed, that we are very confident that the final result can be considered representative of this subject's blood at the time the sample was collected.

That's the ideal situation. And if you collect a sample in accordance with best scientific practice and if everything is documented and if it's all handled appropriately, then you can have confidence that your final result represents the blood at the time the sample was originally collected.

So that's sort of, in theory, what sample integrity is trying to show. The issues in this particular case, based on the records that I reviewed,

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were that, for example, the incident from the inventory form occurred on November 9th, 2011, and the sample was not received by FDLE's laboratory until November 16th, 2011. That leaves open the custody and the condition of the sample for that week, that intervening week.

In addition, the sample went to the responsible analyst in this case on December 13th, 2011, which was more than a month after the sample was originally collected. So there are issues with a couple of factors that studies have shown influence the quality of blood samples; specifically, time and temperature.

In order to protect the integrity of a blood sample, you need to ensure that that sample is refrigerated from the point of collection to the point of analysis. You also need to minimize the amount of time between collection and analysis.

In this case, from the records, I can't demonstrate that temperature was controlled throughout that period. And the time factor of more than a month is undesirable. You want to be able to get these things analyzed as quickly as possible.

Q. Okay. And what's the second area that you have identified?
A. Okay. The second area is method validity.

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And in order for a test method to be considered scientifically valid, it needs to be empirically tested in the laboratory to determine its performance characteristics, how well it works.

And the FDLE laboratory has done some of that for their lab, for their blood alcohol method, but they have not determined the uncertainty of their method. And that speaks to the fact that every measurement result made by every testing laboratory is simply a estimate that is more appropriately scientifically represented as a range of values that includes the true value that can be set to a known degree of confidence. And that uncertainty determination has not yet been done in Florida for their method.

Q. I'm sorry. Let me interrupt you right here.

Are you aware of any other jurisdiction that gives the range instead of a specific number?
A. My understanding is that Washington State is one, and there is another state, but I don't recall it right off the top of my head.
Q. Out of all 50, or out of all the states in the country, only two that you are aware of give the range?
A. That's correct.
Q. Okay. I'm sorry for interrupting you.

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A. That's okay.
Q. And what's the third area?
A. The third area is reliability of performance. And that speaks to how well the lab's quality assurance system is working at the time that the results in question were generated. As I indicated earlier, this sample was analyzed in December of 2011. And so the issues that I identified were issues that were in effect at that point in time.

Do you have a copy of the discovery there in front of you?
Q. Which one are you referring to, the records that Mr. Snure gave you or the --
A. Yes.
Q. I don't have the FDLE data.
A. Well, okay. I will do my best to try to describe them well enough that you can go back and find them, then. In this case, let's see, there is a page that's titled "FDLE-Toxicology Evidence Inventory Form."

And this is a form that is completed by the analysts when they first inventory the evidence in a case. And this form is dated 12/13/11. And it was filled out by the analyst in this case, Ruth Vacha. V-a-c-h-a.

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She documents the packaging and the labeling of the samples in this case and the actual blood specimens, which she documents as two gray-stopped vials, two ten-milliliter, gray-stopped bottles that have sodium fluoride and oxalate additive present in the vials, but she did not document the volume of blood received in the case.

The reason that that's -- well, there are several reasons that that's important. Underfilled tubes could lead to inaccurate results. So it's important to document the actual volume of a tube on receipt. In addition, it's part of the sample integrity documentation because the volume of blood received should be consistent with the volume of blood remaining after testing.

I am currently working on another case in Florida where there are inconsistencies in those volumes. And the reason that it's possible to identify and investigate those inconsistencies is because the analyst documented the volume upon receipt. So in this case, the initial volume on receipt was not documented.

The next form that I'll draw your attention to -- I am putting a Post-It note on these things -- is a typed form that's titled "Alcohol Analysis (AA-4rl)

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Standards and Controls Summary." This is purportedly a documentation of the origin of the calibration standards and the control materials that were used in this case.

The traceability of those standard materials is key to the reliability of the results reported by the laboratory because that's essentially the basis for the lab making a determination as to the concentration of ethanol in the samples, the reliability of these particular standard materials.

In this case, this record is unsigned by the analyst and there is no date for the batch that was run, there is no batch ID number that was run, there is nothing whatsoever to correlate this summary with the actual batch that was run on December 13th, 2011. It's like there is a chain and the links don't match up.

This piece of paper could be -- could have been printed off and used for days or weeks in a lot of different batches. There is nothing to tie this summary to the actual physical preparation of the calibration standards and the control materials on the day that this testing was performed.

This is a really serious deficiency in documenting the work that was done. There is no other way to know what the true values of these calibration

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standards were or the true values of the control materials in this batch.

Q. Now, in your opinion, these three areas that you identified, did they lead to a higher blood alcohol level or lower blood alcohol level?

A. They lead to an unknown blood alcohol level.

Q. Which could have been higher or lower, correct?

A. Correct.

Q. Have you ever done any studies to see how the results would have been affected if they would have followed the applications that you have suggested?

A. I'm trying to understand your question. You asked if I have done any studies to see how the results would have been affected if they had followed the right procedure?

Q. Yes. Followed the procedures that you suggested.

A. I have not done empirical studies, but I have read the literature related to these factors. And that's why these kinds of quality control practices are put in place, to prevent those kinds of problems from occurring and to be able to identify and detect them if they do occur.

Q. Okay. And what did you rely on in coming to

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that conclusion, specific literature?

A. Well, the ISO standard that serves as the basis for the FDLE laboratories' accreditation is ISO17025. And that addresses these kinds of requirements at a very high level. That's probably the most directly applicable reference.

Q. And do any laboratories in the nation follow these correct standards that you have outlined?

A. Yes.

Q. And do they follow every single procedure that you outlined, or are they missing one or two?

A. The requirements of ISO are all required, they are not optional, and there are certainly laboratories who are fully compliant with that standard. There are laboratories that I have reviewed their results and done data audits and have found no deficiencies in the reported results.

Q. And how many laboratories are fully compliant?

A. I can't answer that question. I have not looked at every laboratory.

Q. Okay. Have you come across any laboratories that have been fully compliant?

A. Yes. As I said, I have reviewed work that was fully compliant.

Q. And what area or jurisdiction did you review that was fully compliant?

A. I'm sorry, I don't understand your question. What area or jurisdiction?

Q. The laboratory that you said was fully compliant, which laboratory was that, and what state?

A. Oh. I don't remember if the laboratory was even in the same state where the case may have been. So I wouldn't even be able to answer the jurisdiction question.

Q. Okay. And so off the top of your head, out of all the audit work you have done, you recall seeing one laboratory that was fully compliant; is that correct?

A. I am speaking about a fully compliant data package relating to a specific reported result. And I have seen more than one of those, but when you say "fully compliant," realize, I am only looking at the data that's provided to me. I can't speak to the rest of the operations of that laboratory.

MR. SNURE: I think you are talking about separate things. Lisa wants to know if you have seen other laboratories, I think, Lisa, that were fully compliant with ISO.

THE WITNESS: Yes.

MR. SNURE: And you are talking about laboratories that have produced documents that were compliant, fully compliant, with the request, or that demonstrated that they were in compliance with ISO. Did I miss it?

THE WITNESS: Yes.

MS. GONG: That's what I was asking, Mike.

MR. SNURE: She wants to know what laboratories you have seen, if any, that were fully compliant with ISO.

THE WITNESS: Yes, I have seen laboratories that are fully compliant with ISO in the areas that I have reviewed. In general, they have been commercial laboratories, not operated by state agencies or local agencies.

Q. (By Ms. Gong) Do you recall the names of these commercial laboratories?

A. I'm sorry, I don't.

Q. Do you know how many you are referring to?

A. No, I'm sorry, I don't.

Q. Okay. And how many, over the course of your experience in this field as a quality -- a certified quality auditor, how many laboratories have you audited?

A. I have conducted on-site audits that are

typically several days long of dozens of laboratories. I have conducted data audits of many, many more laboratories. I have never tried to count, but well in excess of 100.

Q. I only have one more question.

Did you review the standard operating procedures for the lab, or did you just review the FDLE regulations?

A. I reviewed the standard operating procedures for the laboratory.

MS. GONG: I don't have any other questions. Mike, do you have any questions?

MR. SNURE: No.

MS. GONG: Okay. We'll go ahead and say she is a read, and I will order a copy.

(Deposition concluded at 12:24 p.m.)

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
COURT, IN AND FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs. Case No.: 48-2011-CF-015217-O

DIVISION: 16

STEVEN FRANK MEAD,

Defendant.

CERTIFICATE OF COMPLETION

I, Denise Kopan, CCR #124, DO HEREBY CERTIFY that on July 15, 2013, the deposition of JANINE ARVIZU was taken before me at the request of, and sealed original thereof retained by:

For the Plaintiff
MS. LISA GONG
415 North Orange Avenue, Suite 400
Orlando, Florida 32802

I FURTHER CERTIFY that copies of this certificate have been mailed or delivered to all counsel, and parties to the proceedings not represented by counsel, appearing at the taking of the deposition.

I FURTHER CERTIFY that examination of this transcript and signature of the witness was not waived by the witness and all parties present.

On _____, a letter was mailed or delivered to Ms. Janine Arvizu regarding obtaining signature of the witness, and corrections, if any, were appended to the original and each copy of the deposition.

I FURTHER CERTIFY that the recoverable cost of the original and one copy of the deposition, including exhibits, to Ms. Lisa Gong is $_____.

I FURTHER CERTIFY that I did administer the oath to the witness herein prior to the taking of this deposition; that I did thereafter report in stenographic shorthand the questions and answers set forth herein, and the foregoing is a true and correct transcript of the proceeding had upon the taking of this deposition to the best of my ability.

I FURTHER CERTIFY that I am neither employed by nor related to nor contracted with (unless excepted by the rules) any of the parties or attorneys in this case, and that I have no interest whatsoever in the final disposition of this case in any court.

Original Signed by Denise Kopan

DENISE KOPAN, RPR, CCR
New Mexico CCR #124
License Expires: 12/31/13

STATE OF FLORIDA v. STEVEN FRANK MEAD
DEPONENT SIGNATURE/CORRECTION PAGE

If there are any typographical errors to your deposition, indicate them below.

PAGE	LINE		
_____		Change to	_____
_____		Change to	_____
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Any other changes to your deposition are to be listed below with a statement as to the reason for such change.

PAGE	LINE	CORRECTION	REASON FOR CHANGE

I, JANINE ARVIZU, do hereby certify that I have read the foregoing pages of my testimony as transcribed, and that the same is a true and correct transcript of the testimony given by me in this deposition, taken on July 15, 2013, except for the changes made.

_____
JANINE ARVIZU

_____
DATE

DATE DELIVERED/MAILED_____RETURN BY_____

MS. JANINE ARVIZU
161 Kuhn Drive
Tijeras, New Mexico 87059
RE: STATE OF FLORIDA v. STEVEN FRANK MEAD
Deposition of: JANINE ARVIZU
Date Taken: July 15, 2013
DEAR MS. ARVIZU:
At the time of the above deposition/sworn statement, it was requested that the deponent read and sign the transcript.

_____ Enclosed is your copy of the transcript with the original signature page. Please ask the witness to read the transcript and make any corrections on the original signature page and return the original signature page to our office.

_____DUE TO TRIAL IN THIS MATTER BEING SET FOR _____, SIGNATURE MUST BE COMPLETED BY _____.

_____Enclosed is a courtesy copy of the transcript with the original signature page. Please read the transcript and make any and all corrections to your testimony that you feel are necessary and indicate such corrections on the attached page. Please only return the attached original signature page to our office, not the transcript.

_____The deposition transcript is now ready to review in our offices. Please call 505-243-5018 to make arrangements for reading and signing.

_____The transcript is now ready for review. Please remit payment in the amount of $_____. Your transcript will be delivered as soon as payment is received. If you choose not to pay, please contact our office at 505-243-5018 to make arrangements for reading and signing.

_____Other:_____

In most instances, witnesses are provided 30 days from the receipt of this letter to read and sign the transcript. Failure to read and sign within this time will result in the original transcript being filed without the signature page.

Your immediate attention to this matter will be appreciated. If you have any questions, please call us at 505-243-5018.

_____
KATHY TOWNSEND COURT REPORTERS

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