

1 IN THE CIRCUIT COURT OF THE
2 NINETEENTH JUDICIAL CIRCUIT
3 IN AND FOR INDIAN RIVER COUNTY
4 STATE OF FLORIDA

5 CASE NO. 96-298-CF

6 STATE OF FLORIDA, :

7 Plaintiff, :

8 vs. :

9 DENNIS SCALFANI, :

10 Defendant. :

11 DEPOSITION OF: RICK SWOPE

12 DATE: Not given

13 TIME: Not given

14 PLACE: Office of the State Attorney
2000 16th Avenue
Vero Beach, Florida

15 TAKEN BY: Plaintiff

16 APPEARANCES:

17 FOR THE STATE:

18 CHRISTOPHER E. TAYLOR
Assistant State Attorney
2000 16th Avenue
Vero Beach, Florida

19 FOR THE DEFENDANT:

20 CHARLES SULLIVAN, JR.
1601 20th Street
Vero Beach, Florida

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1 MR. TAYLOR: We're here for deposition in the case of
2 State of Florida versus Dennis Scalfani, case number 96-298-
3 CF.

4 Here for this deposition and present is Chris Taylor for
5 the State Attorney's office; uh, Charles Sullivan, Jr., uh,
6 attorney for the defendant; and also here is the deponent,
7 Rick Swope.

8 I'm going to put you under oath at this present time
9 here. Raise your right hand. Do you swear or affirm the
10 testimony you are going to give during this deposition will be
11 the truth and nothing but the truth, so help you God?

12 THE WITNESS: I do.

13 BY MR. TAYLOR:

14 Q Please state your name.

15 A My name is Rick Swope, S-w-o-p-e.

16 Q And what is your business address?

17 A 2941 Southwest 87th Avenue, Number 401, Davie,
18 Florida 33328.

19 Q And phone number.

20 A 954-476-7640.

21 Q What is the nature of your business?

22 A I do, uh, primarily accident construction.

23 Q Do you do anything else in your business?

24 A Yes.

25 Q What is that?

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1 A I do, uh, consulting in DUI cases, uh, regarding the
2 breathalyzer and field sobriety testing. I also write
3 articles dealing with the intoxilyzer and field sobriety
4 testing. And I've been teaching at the Broward County Police
5 Academy since 1985. And I lecture around the country, uh,
6 involving either accident reconstruction with DUI's, uh, DUI
7 itself.

8 Q Uh, were you hired as an expert in the case of State
9 of Florida versus, uh, Dennis Scalfani?

10 A Yes.

11 Q And who were you hired by? .

12 A Charles Sullivan.

13 Q And, uh, for what purpose were you hired?

14 A Uh, I was initially just hired to look at this case
15 and to see if I could come up with any opinions as to how this
16 accident may have occurred.

17 Q So your expertise was, uh, you were asked to apply
18 you expertise in the area of what in this case?

19 A Well, just really what I indicated in accident
20 reconstruction, whatever opinions -- other opinions that I
21 might have. I wasn't asked directly to -- to come up with any
22 type of opinion.

23 Q I understand, but you were asked to, uh, give your
24 opinion as to the accident reconstruction rather than anything
25 having to do with alcohol in this case?

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1 A No. Uh, again I was not asked to do anything
2 specific. I told Mr. Sullivan I would look at the case and
3 then I would give him my opinions. Whether he decided to use
4 them or not or he felt they were appropriate was up to him.

5 Q Okay. And, uh, what type of opinions were you -- or
6 what -- when you asked to look at the case and give your
7 opinions, opinions about what specifically?

8 A Well, just basically the opinion is going to deal
9 with, uh, the fact of was there any reckless operation by Mr.
10 Scalfani. Was there, uh, any impairment by Mr. Scalfani and
11 what may -- may or may not have caused the accident and, uh,
12 do -- is there any reckless action or speeding which what I
13 guess contribute or be the charge of, uh, DUI manslaughter.

14 Q Okay. Do you have a curriculum vitae with you?

15 A Yep.

16 Q May I have a copy of that?

17 A It's yours.

18 Q Thank you. Did you receive an interrogatory from
19 State Attorney's office in Vero Beach?

20 A Yes.

21 Q And have you, uh, completed that?

22 A Yep.

23 Q And did you send it back to our offices?

24 A Yep.

25 Q Do you have a copy of that with you now?

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1 A No.

2 Q The answer to those interrogatories?

3 A No.

4 Q Okay.

5 A I don't think I brought it with me. No.

6 MR. SULLIVAN: Chris, could you make a note, uh, to
7 (indiscernible) if you do have it.

8 MR. TAYLOR: Yeah, because I haven't seen it is the
9 reason I ask.

10 MR. SULLIVAN: Oh, okay. I haven't seen it either, so.

11 BY MR. TAYLOR:

12 Q Okay. Uh, what were you provided in order to make
13 your opinions in this case?

14 A I was provided with photographs from the police
15 department. Uh, a traffic homicide report. I also reviewed a
16 couple of, uh, letters from Mr. McElroy to the State
17 Attorney's office. I viewed the Defendant vehicle and I also
18 have been to the scene. And that's pretty much it.

19 Q Okay. And what did you do at the scene?

20 A I took some measurements and prepared a scale
21 diagram.

22 Q When did you go to the scene?

23 A June 11th of 1996.

24 Q Did you observe any existing evidence that was
25 located there that indicated that this accident had happened

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1 at the location?

2 A Just -- just the bridge being replaced where the
3 bridge was damaged, but that was it.

4 Q Did you speak to any witnesses in this case?

5 A Uh, no, I'm not aware of any witnesses.

6 Q Did you speak to anyone other than Mr. Sullivan
7 that's connected with this case?

8 A No.

9 Q Did you speak to Mr. Scalfani, the Defendant?

10 A Not that I'm aware of. My office may have called
11 him about the location of his vehicle. Uh, but I -- as far as
12 I know I didn't have any direct conversation.

13 Q And from what you -- did you make any reports.

14 A No.

15 Q Written reports in regards to your findings?

16 A No. I have notes, but no reports.

17 Q Okay. And, uh, are -- do you plan to make a report
18 in this case?

19 A No.

20 Q Can you tell me what, uh, your opinions are from
21 viewing all the evidence that you've gathered?

22 A Basically my opinions boil down to just a couple of
23 areas. I have a bunch of notes on it, but the opinions are is
24 that there are no signs of reckless operation, uh, speeding
25 from Mr. Scalfani in this case. Uh, at most I would say there

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1 would be careless driving if anything. And that's basically
2 it.

3 Q Now what brought you to the opinion that there was
4 no reckless driving?

5 A Well, everything. The police report, uh, my
6 inspection of the vehicle, reading your expert's report.
7 There's certainly nothing to indicate any excessive speed.
8 There's nothing to indicate that, uh, Mr. Scalfani fell asleep
9 or passed out. Uh, the damage is not severe in the vehicle.
10 In other words he didn't hit the bridge at a hundred miles an
11 hour. Uh, there's no markings on the road that indicated that
12 he made the turn at a high rate of speed which should be
13 evidence if indeed he did make the turn at a high rate of
14 speed. There's no indication of speed at all. Uh, that's
15 some of the things that I looked at.

16 Q Okay. How'd you make your deter -- determination
17 that the Defendant in your opinion did not fall asleep or
18 become unconscious as far as his driving?

19 A Well, because you don't fall asleep or become
20 unconscious when you're making a turn. You fall asleep or you
21 become unconscious when you're driving straight and you run
22 off the road, not in the middle of a turn. And certainly not
23 at twenty some miles an hour when you get right in the middle
24 of the turn decide to fall asleep.

25 Q Uh --

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1 A And some -- and the other factor I looked at was
2 that that whole road is consumed with canal down that whole
3 road and to fall asleep and begin to make a turn and just
4 happen to be at an intersection where you fall asleep in the
5 middle of the turn in one of the few streets that cross the
6 canal is probably about a hundred trillion to one maybe.

7 Q Is that your own statistics or do you have some --

8 A Well, I couldn't find a statistic because it doesn't
9 go that high. Uh, there's no literature anywhere in the world
10 that indicates you're going to fall asleep in a middle of a
11 turn, uh, in one canal drive along a road that has just a
12 couple of drives over a couple of miles and to fall asleep
13 just in the middle of a turn at twenty some miles an hour.

14 Q On what basis did you make your opinion that one
15 cannot fall asleep while making a turn at intersection?

16 A Common sense. Just like I know to open the door
17 before I go through it. I don't have to figure out
18 mathematically that I have to turn the handle and move the
19 door back. Common sense is going to tell you and the fact
20 that I've investigated over five thousand accidents on the
21 scene, uh, that just doesn't happen.

22 Q So this would not be based on the common sense of a
23 every day person. This would be based on the common sense
24 based on your expertise.

25 A Oh, I think both.

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1 Q Have you viewed any statements by this Defendant
2 that he has allegedly made to law enforcement or others?

3 A No. Unless it's contained in the police homicide
4 report. That's the only thing I've reviewed.

5 Q Okay. Uh, you stated that there was no evidence of
6 speeding.

7 A Right.

8 Q How did you come to that determination?

9 A Well, I came to that three different ways. Number
10 one, looking at the vehicle, also looking at the turn --

11 Q Well, let's take it one by one. What about the
12 vehicle led you to believe it wasn't speeding?

13 A Well, there's again -- the vehicle goes into what I
14 consider to be the markings or lack of markings on the
15 roadway. Looking at the police photographs and the police
16 homicide report there are no indications of skid marks, scuff
17 marks, scrub marks, anything like that in the turn itself that
18 would indicate that he was making a high speed turn. Number
19 two, uh, the distance that he traveled, uh, Mr. Scalfani
20 traveled after he made contact with the bridge, uh, also
21 viewing the photographs, uh, there appear to be in a couple of
22 the photographs tire tracks on the dirt before he actually
23 rolled over or fell into the canal. Uh, those certainly
24 indicate to me he didn't vault over there. In other words, he
25 didn't make contact with the bridge and fly a hundred and

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1 fifty feet in the air and come down on the side. Although I
2 can really see very little in the photos because the sheriff's
3 office evidence eradication team was out there driving all
4 over the scene, uh, so you can't tell tire tracks, one set of
5 tire tracks from another. Also I looked at the report of your
6 expert, who indicated there was no speed. I used similar
7 formulas as he used and came up with roughly a speed in the
8 same area.

9 Q Okay. So you viewed the vehicle, the distance of
10 traveling. You said there's a third way.

11 A Yeah, well, I looked at your -- your, uh, expert's
12 report and mine as well and we come up with --

13 Q Based on the State's Attorney expert?

14 A Right, uh huh.

15 Q Now you said that there was, uh, maybe careless
16 driving. Did you say yes --

17 A There possibly could be careless driving.

18 Q Sure.

19 A You could -- you could probably consider that and I
20 would say if you have -- uh, if you have a -- a good
21 investigation and a good police report on it you would
22 probably would have that.

23 Q Now what led you to believe there possibly was
24 careless driving in this case?

25 A Well, careless driving is just maybe an operation of

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1 a vehicle. In other words, losing control of a vehicle. Uh,
2 careless driving actually can be anything. Uh, if you run a
3 red light you can consider that to be careless operation. But
4 the fact that, uh, Mr. Scalfani did make a turn and either
5 something caused him to go off the road or he went off the
6 road himself that could be construed as to be careless
7 driving.

8 Q Okay. You came up to your opinion there is no
9 reckless driving, no speeding, but possibly careless driving.

10 A That's correct.

11 Q What is, uh, you said that you could possibly be
12 more specific on the careless driving if what occurred?

13 A Well, in other words, uh, if the investigation would
14 have centered on factors that should have been centered on at
15 the scene rather than everybody, number one, driving all over
16 the scene, uh, number two, taking photographs of the roadway
17 where we could see and checking the roadway if there were any
18 types of marks which may indicate that Mr. Scalfani made some
19 kind of quick move or maneuver. What type of pattern did he
20 make the turn? Uh, those are things that you'd have to look
21 at. Another factor would be, I noticed that in the
22 photographs the right front tire is deflated on the vehicle
23 and basically it's almost off the rim which indicates to me a
24 couple of things. Uh, number one, that should have been
25 looked at to see if the tire blew pre-impact with the bridge,

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1 that would be a possibility. If, in fact, that did happen
2 then that would be a -- a reason that Mr. Scalfani did hit the
3 bridge and go over. If the tire blew on impact with the
4 bridge, meaning that the curve and raised median area, that
5 would be another factor that you'd want to look at to
6 determine that indeed Mr. Scalfani directly ran into the
7 bridge and for whatever reason. So those issues should have
8 been addressed before the vehicle was released at the scene.

9 Q So basically you're saying you can make a more
10 definite opinion if one, people didn't drive over the scene,
11 two, you had pictures of the roadway, and, uh, three, there
12 was an inspection of the tire, the front -- right front tire
13 that was off the rim.

14 A That would be some of the things I certainly would
15 have looked at, yes.

16 Q Okay. Uh, what would you expect to find if you
17 examined -- what different things would you look at if you
18 examined the tire off the rim?

19 A Well, the things that I would examine were number
20 one, uh, inspecting the roadway, is there any indications
21 either in the wheel well or somewhere on the tire that the
22 tire was actually deflated before impact with the bridge. And
23 that could be done a number of ways. It could be looking at
24 the road, uh, it could be looking at the tire to see if the
25 tire was folded over and driven, in other words, if you've

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1 ever driven on a flat tire before the tire obviously begins to
2 come off the rim at some point if you drive far enough or long
3 enough. Secondly, uh, if the tire was deflated for any period
4 of time, whether it be a short period or not, before it made
5 contact with the bridge abutment, which I guess you'd consider
6 to be the raised abutment, there possibly would be asphalt,
7 uh, in the tire rim itself. In other words, that's a pretty
8 easy thing for investigators to determine. Uh, also when the
9 truck -- the right front tire made contact with the median
10 itself, uh, if there's markings on that other than rubber that
11 could indicate that the tire was flat before it struck the
12 median. And it's very easy to determine because obviously if
13 the tire is flat when it strikes the concrete median the
14 distance between the tire rim and the median is going to be
15 minimal because of -- there's no air in the tires. So those
16 are some of the things that -- that should have been looked at
17 by the investigator to determine if, in fact, the tire
18 prematurely deflated for whatever reason that may be, or if
19 the deflation was caused by striking the median. And also
20 normally if -- if the right tire strikes the median -- the
21 raised median with the tire inflated generally there is some
22 kind of bending to the tire rim itself, which is usually --
23 usually pretty evident to see. It's kind of like hitting a
24 curb at a -- at a high rate of speed and blowing your tire.

25 Q If you had looked at the tire and determined it was

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1 flat before it struck the median what kind of opinion would
2 you come up with then?

3 A Well, then it would be my opinion that wouldn't be a
4 careless driving because if -- if something happened to the
5 vehicle and the tire was deflated then obviously that could
6 have caused, again depending on where it happened, if it was
7 in the turn that could have caused Mr. Scalfani to, uh, not
8 lose control, but it could have caused his vehicle to end up
9 going to the right striking the median and at that point he
10 would have lost control. Because as soon as you make contact
11 with the median in a turn it's going to grab the vehicle and
12 pull it to the right. Uh, so that could be one reason why he
13 went off the road.

14 Q Okay. If -- if you made a determination through
15 investigation that that tire was flat before it struck the
16 median how many different possible opinions would you come up
17 with then?

18 A Well, the only --

19 Q What you just stated?

20 A Well, the only one I really would come up with is
21 that the fact that I would not consider that to be a careless
22 operation if the tire blew. You can maybe say it's an
23 improper lane usage. Uh, you can say it's, uh, I guess
24 improper turn wherever you want the citation might be, but it
25 certainly isn't a careless driving if -- if it's a mechanical

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1 -- and although a tire may not be considered mechanical, if
2 there's some kind of vehicle problem then I would say that's
3 not a careless operation. The driver has no control over that
4 happening.

5 Q Okay. So if you made a determination that the tire
6 was flat before it struck the median it's your opinion that
7 the driver had no control over the vehicle and that's what
8 caused him to go into the ditch.

9 A No, I never said he had no control over the vehicle.
10 What I said is that would cause the vehicle to be pulled to
11 the right. After he makes contact with the median he then
12 would not have control.

13 Q So -- okay. I know there's no definite yeses or nos
14 I guess in accident reconstruction, but I guess it's a
15 possibility still he could have been careless driving even if
16 the tire was flat before it struck the median.

17 A No, no.

18 Q It would not be possible that he was careless
19 driving if that --

20 A No.

21 Q -- tire was flat before it hit the median?

22 A Not based on the facts we have. If he was speeding
23 and the tire blew I would agree with you. If he was making
24 some kind of crazy turn. In other words if he had almost
25 passed the bridge or was trying to slide into a turn I'd agree

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1 with you. But because he's making a turn at a slow rate of
2 speed and I think your expert said very slow rate of speed,
3 uh, then I would say that's not careless driving. If any of
4 the other elements exist I'd agree with you a hundred percent.

5 Q Okay. Did you come up with any other opinions?

6 A Uh, well, actually I always have a lot of opinions
7 in a case, but I don't know if it's relevant or not so I
8 usually write down --

9 Q Okay.

10 A -- what my notations are. You either can read my
11 notes or I can read them to you. Whatever you'd like.

12 Q Well, just go ahead and tell me and if you can you
13 can give me a copy of that if you prefer to.

14 A You can have a copy of whatever I -- I have.

15 Q Okay.

16 A I'm just going to, uh, concentrate on what I thought
17 was important. Mr. Sullivan may not think it's important, but
18 this is what I put down for notation. Is, uh, we already
19 discussed the right front tire issue so I'm going to -- going
20 to skip over those first few lines because we discussed that.
21 Uh, we also discussed in the middle of my notations that there
22 are no indications of excessive speed. I have three pages of
23 -- of formulas I ran off. If you'd like a copy you can have
24 that.

25 Q Great.

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1 A They're basically similar to Dr. McElroy's, uh, the
2 numbers are just a little different, but I think the
3 conclusions are about the same. So you can certainly have a
4 copy of that if you'd like. Uh, I also made an opinion on the
5 alcohol. And I'll -- I'll read you exactly what I have in my
6 notes. The alcohol issue in my opinion was totally
7 ridiculous. In checking with Dr. Jensen, Dr. Rose, Gene
8 Detuscan and Dave Fries (phonetic) as well as my own studies
9 and working in the alcohol field, any attempt at extrapolation
10 basically would be made by someone who is making the biggest
11 reach possible. I could not find any treatises, I couldn't
12 find any statements, any articles, uh. I spoke with people
13 who I thought were some of the best in the field to find out
14 if it was possible to extrapolate or make any kind of
15 scientific analysis of a person whose -- my understanding was
16 in the water several hours. Uh, and I couldn't find one --
17 one person, uh, that was knowledgeable in the field to
18 indicate that they would give an opinion other than to say
19 that, uh, it would be totally unreliable and it would be pure
20 speculation. And they went so far -- all of them went so far
21 as to say they wouldn't know anyone that would make that
22 opinion. Uh --

23 Q Do you have -- have anything else?

24 A Just one other thing.

25 Q Okay. Uh, is that according to the police officer

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1 there was a witness in this case that was somewhere in the
2 area, uh, apparently this witness was a female and she was
3 traveling on the same road that Mr. Scalfani was and at some
4 point Mr. Scalfani passed her in a no passing zone and she was
5 either a quarter to a half mile behind him and that's a pretty
6 straight stretch of road there. At least that's my
7 recollection from being out there. And that she didn't see
8 anything usual after he passed, but that at some point she
9 reached the bridge where this accident occurred so looked down
10 the road and didn't see any tail lights. Uh, I thought that
11 that was rather unusual that if there was a driving pattern
12 such as the traffic accident homicide investigator indicated
13 that he took this corner at a high rate of speed, made this
14 big turned, crashed through the bridge, et cetera, I would
15 think that a driver in any type of position would be able to
16 see that from where she was at so I didn't put too much
17 credence in my investigation on that unless there's something
18 else she said that I'm not aware of. And my last sentence is
19 just that falling asleep is not an issue in this case as far
20 as I'm concerned.

21 Q Okay.

22 A I think I discussed that with you before.

23 Q Right. Now, uh, who is Dr. Jensen?

24 A Dr. -- uh, his name is [REDACTED] He's out of
25 Minnesota. I would say he's probably about the second most

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1 noted expert in the country in alcohol studies. Uh, I would -
2 - I would say Dr., uh, Curt Debowsky (phonetic) would be
3 first. Uh, at least in my opinion. Obviously you may have a
4 different opinion. Uh, but Dr. Jensen is probably one of the
5 most noted experts in the United States, written many
6 articles, been published numerous times, does countless
7 studies with alcohol subjects, uh, testifies for the State and
8 for the Defense. I believe he was in charge of Minnesota's
9 alcohol program for several years. Although I think he's been
10 on his own now about five or six years. I'm sure you can pull
11 his name up quite regularly.

12 Q And, uh, Dr. Rose?

13 A Dr. Stephen Rose, he works, uh, at Miami. Uh, I
14 believe he was one of the chief toxicologists for the Dade
15 County State Attorney's office for -- I don't want to speak
16 for him, I think he was there about six or eight years. He
17 went into private practice about two years ago. Uh, I've
18 listened to his lectures. I've read some of his material.
19 He's working now either at Jackson or U of M, I don't know for
20 sure. But I do talk to him occasionally and I think he's, uh,
21 pretty noted as far as I'm concerned.

22 Q Now when -- did you speak personally with Dr.
23 Richard Jensen?

24 A Yes, I -- matter of fact I was with Dr. Jensen for
25 three days, uh, two weeks ago. I was in Atlanta at a seminar

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1 and I had -- I talked for three hours a day at a four day
2 seminar. Dr. Jensen talked for four hours a day. So I got to
3 speak with him quite a bit during that three or four day
4 period.

5 Q Dr. Stephen Rose, you spoke to him personally.

6 A Yes, I have.

7 Q Dr. Curt Debowsky, you spoke to him personally about

8 --

9 A No.

10 Q -- this case?

11 A No, I did not. I was not able to get ahold of Dr.
12 Debowsky.

13 Q So you spoke to, uh, two people concerning this
14 subject.

15 A No.

16 Q Dr. Rosen.

17 A No. I spoke --

18 Q Dr. Jensen.

19 A I spoke with, uh, Gene Detuscan from the Broward
20 County Medical Examiner's office. He's the toxicologist.

21 Q What -- Gene Detuscan?

22 A Yeah, it's, uh, D-e-t-u-s-c-a-n.

23 Q And --

24 A I did --

25 Q Is that a man or woman?

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1 A That's a man.

2 Q And he works for who?

3 A Uh, Broward Medical Examiner's office. He's the
4 toxicologist. And I've -- I've known Gene for years and I
5 didn't give him the facts of this case. I didn't tell him the
6 name of it. I just called him up and asked him, uh, a
7 hypothetical about hypothermia and, uh, how long he would
8 actually extrapolate, could he extrapolate back during the
9 period of time. So I didn't really give him this case name.
10 Whereas, Dr. Jensen I believe I did give him the facts -- told
11 him the facts of the case.

12 Q All right. Now when you spoke -- did you speak to
13 anyone else besides these three individuals?

14 A One other person. I spoke with Dave Fries. Dave
15 Fries is a deputy with the Broward County Sheriff's office who
16 I worked with for ten years. Uh, Dave is a breath expert. He
17 extrapolates quite frequently for the State. Uh, again you
18 have to get Dave's background. I'm not sure. But he's not a
19 doctor or anything. But Dave has conducted experiments with
20 me over the past ten years, uh, and he's conducted his own on,
21 uh, rates of elimination, that kind of stuff. And I wanted to
22 see if he was aware of anything on hypothermia and how far he
23 would safely feel that he could extrapolate. Because I know
24 that there is case law involving breath extrapolations that
25 I'm aware of. And I think the farthest one I've seen is about

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1 three hours. Uh, but generally it's Dave's opinion and mine
2 that we don't go over two hours on a breath case. I know this
3 is blood, but on a breath case we don't go over two hours.

4 Q Did you speak to anyone else?

5 A Uh, not to my knowledge, no sir.

6 Q Okay. So you spoke with Dr. Richard Jensen, Dr.
7 Stephen Rosen, Gene Detuscan and Dave Fries.

8 A Correct.

9 Q Now when you spoke to these individuals did they
10 have any studies or anything they're relying upon in order to
11 make their opinion?

12 A Well, no that was the problem. They -- they
13 indicated that there were none. That they couldn't find any
14 that, uh -- They found articles that -- I think Dr. Jensen's
15 office called me and said that there were articles where
16 people extrapolated maybe four or five hours back, but -- but
17 that was all based on other factors. That they couldn't find
18 any on hypothermia and this type of situation where somebody
19 was in the water for that long a period of time. That there
20 just were none. They couldn't find any. And I couldn't find
21 any through my research either.

22 Q Did you find any studies regarding, uh, alcohol
23 elimination from the body and hypothermia?

24 A Nothing that matched this case, no.

25 Q Did you find anything?

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