

State of Buckeye V. Quinn Woolf FINAL ERRATA

Errata 12/17/2018

****Procedural Clarification****

Although the hearing taking place is an exclusionary hearing, Quinn Woolf *does* retain a Fifth Amendment right to not testify. In the event a team wishes to invoke this right, opposing counsel cannot make mention of Quinn's failure to testify (including in opening/closing arguments, and/or in examination of other witnesses) (*Griffin v. California*, 380 U.S. 609 (1965)).

In the event that Quinn Woolf does testify, the defendant does not waive their Fifth Amendment rights by participating in the exclusionary hearing. Under *Simmons v. U.S.*, 390 U.S. 377, (1968), a defendant may testify at a suppression hearing to establish Fourth Amendment protections and their testimony may not be used against them at trial to establish guilt pursuant to the Fifth Amendment.

We are providing this information so teams are not forced to violate the rule against outside research to protect their client.

1. **Do we know Quinn Woolf's age? They were in high school, but it appears they were arrested as an adult.**

Quinn Woolf is subject to prosecution as an adult.

2. **The contract specifies in item 5 that the drone must be equipped with "hard drive capacity sufficient for at least 1 (one) continuous hour of recording." However, Parker Monroe's statement notes that the drone can only fly for about 30 minutes. Is this a mistake in the contract?**

No elaboration needed

Errata 12/11/2018

1. **Exhibit D is titled "Enhanced Image" but there are three different levels of enhancement. Please clarify.**

The main image showing an aerial view of the gazebo is the initial image captured by the drone. The next image depicting the notepad and laptop is the zoomed image. The final image depicting the note pad is the enhanced image.

Errata 11/27/2018

- 3. Parker Monroe is addressed as Dr. Monroe, but there is no mention of their doctoral education within their witness statement. Parker Monroe graduated from MIT in 2007 with a degree in Mechanical Engineering; is this a BS or Doctorate degree?**

The degree referenced on line 12 of Parker Monroe's witness statement refers to an ScD in Mechanical Engineering.

- 4. Was Eli Moss stationary while flying the drone over the 500 acres of farmland or did they walk along the path noted in Exhibit C to maintain a visual of the drone?**

Eli moved within the property, but not necessarily along the line of the flight path in Exhibit C. Eli moved only to maintain a visual of the drone.

- 5. The drone in this case, the DJI Matrice 600 Pro, is a real drone. Would information about the drone, such as size, features, and intended use be within the knowledge of Parker Monroe, Eli Moss, and Dylan Ulrich, or would this be considered outside research?**

The necessary details about this drone have been included in the witness statements. Any additional information about the drone is considered outside research and is prohibited.

- 6. In Officer Miller's testimony (lines 87-89), it is implied that the images from the drone footage clearly show Quinn Woolf as compared to a known image of Quinn. However, Exhibit C only shows an arm/hand. Is Exhibit C the image referenced in the testimony, or is there another image that was not admitted into evidence that shows the entire personage of Quinn Woolf?**

The image in Exhibit C is a video still used to identify the code. The remainder of the drone footage shows Quinn Woolf's entire person.

- 7. In their witness statement, Quinn Woolf describes the lattice work on the sides of the gazebo. However, Exhibit D includes a photo of the gazebo without the lattice work. Which is correct?**

The entirety of the lattice work is not visible from the angle shown in Exhibit D.

Errata 11/13/2018

- 1. Regarding exhibit C, is there a fence around the Woolf home property?**

The lines separating parcels of land on exhibit C are property lines, not fences.

2. **Regarding Exhibit C: Map of Executed Flight Path, was this the plan that Eli Moss was supposed to submit before conducting the flight, per the contract? If not, do we know who submitted this plan?**

Exhibit C is the executed flight path, meaning the path actually flown, and is stipulated by both parties as accurate and authentic.

3. **The price of the DJI Matrice Pro is given as \$4,999.00 per Defense brief on page 53. This is not listed in any witness statements. Is it fair to assume that Eli Moss would know this price since he purchased the drone?**

Eli did purchase the drone; therefore, it is a reasonable inference that they would know the price if asked on cross examination. See procedural rule A on page 19 and rule of evidence 611, B on pages 29-30.

Errata 10/30/2018

1. **On page 51 of the case file, the defense brief references Article I, Section 14 of the Buckeye Constitution. The Buckeye Constitution is not included in the case file; please advise.**

The language of Article I § 14 of the Buckeye Constitution is identical in form and function to the Fourth Amendment to the United States Constitution, which is provided on page 103 of the case file.

2. **On page 58 of the case file, Prosecution states that Sam Stone filed a police report regarding the pension fund theft on September 15, 2018. However, on page 84 of Quinn Woolf's witness statement, lines 91-92, Quinn states that the police confiscated the journal a few days after August 24. Was the journal confiscated before a police report was filed?**

There is an error in Quinn Woolf's witness statement on page 84, line 91-92. The second sentence should read, "A few weeks after August 24..." (emphasis added). The timeline difference was an unintentional error.

Errata 10/16/2018

1. **The city contract (Exhibit B) seems incomplete with an unfinished sentence at the end. Is this intentional?**

Exhibit B is only an excerpt from a multi-page contract. The portion included in the case file contains all relevant information

Errata 10/2/2018

1. **The case packet says the prosecution has the burden of proof, but then the procedural rules state the defense will present first. Which is correct?**

Prosecution will present first. There is an error in procedural rule 10.a., 12.a., 12.b., and 14.a (pg. 21-23). Prosecution will present opening arguments first, call witnesses first, and present closing arguments first. Counsel for the Prosecution will have time for a

two-minute rebuttal after Defense’s closing argument. There is also an error in the “Timekeeping Sheet” in the case file on page 137. Included in this document, you will find a corrected “Timekeeping Sheet” which accurately reflects that Prosecution will present first.

2. In different places, the case mentions both Northridge Police and Buckeye Police as the investigative body. Which is correct?

In both the defense and prosecution briefs, there are errors in reference to the police department. Harmony Police, the department where Office Jordan Miller is employed, is the investigative body responsible for the search in question. This case takes place in the *state* of Buckeye, the *county* of Buckeye, and the *city* of Harmony. Specifically, refer to the following list for corrections:

- On page 47, the order should read “through or as a result of *Harmony Police’s* alleged unlawful search.”
- In Defense’s motion on page 48, Buckeye Police is referenced twice. This should be changed to Harmony Police.
- Prosecution’s brief incorrectly refers to the Northridge Police Department twice on page 59. Both instances should refer to the Harmony Police Department.

3. The memoranda in support have inconsistencies in regards to who contracted with Omniscient Technologies to survey the farmland.

The contract with Omniscient for the land survey was entered into by the City of Harmony. Refer to the following list for corrections:

- On the bottom of page 49, the last paragraph incorrectly refers to a contract between Eli and Buckeye. This should be referred to as a contract between Eli and Harmony.
- The first full paragraph on page 52 should begin, “Here, it is clear from the relationship between Omniscient and *the state* that...the acts of Eli Moss and Omniscient were actually the acts of *the state*. To be sure, Omniscient entered into a contract with *Harmony*.”
- There is an error in the final paragraph on page 61. The last sentence should read, “There is no evidence of a symbiotic relationship between Omniscient Technologies and *Harmony*...”

Errata 9/24/2018

- 1. Due to a printing error, the student manuals (bound copies) of the case have improperly formatted exhibits. All shipped orders of the student manuals contain correctly formatted exhibits in a stapled pack in the front of the book.**

This printing error *DOES NOT* impact the teacher copies (in red folders) nor the digital copies.

Ohio High School Mock Trial Competition

Timekeeping Sheet

Prosecution Team _____ Defense Team _____ Trial

Opening Statements (4 minutes each)

Prosecution _____
Defense _____

Direct/Redirect Examination of Two Prosecution Witnesses (20 total minutes)

FIRST WITNESS (ending time) _____
SECOND WITNESS (cumulative ending time) >20 = time violation _____

Cross/Recross Examination of Two Prosecution Witnesses (18 total minutes)

FIRST WITNESS (ending time) _____
SECOND WITNESS (cumulative ending time) >18 = time violation _____

Direct/Redirect Examination of Two Defense Witnesses (20 total minutes)

FIRST WITNESS (ending time) _____
SECOND WITNESS (cumulative ending time) >20 = time violation _____

Cross/Recross Examination of Two Defense Witnesses (18 total minutes)

FIRST WITNESS (ending time) _____
SECOND WITNESS (cumulative ending time) >18 = time violation _____

Closing Arguments (5 minutes each)

Prosecution _____
Defense _____

Rebuttal (optional) (2 minutes)

Prosecution _____

REMEMBER: CLOCK STOPS FOR OBJECTIONS!

TIMEKEEPER'S SIGNATURE

Revised Case File Pages

The pages that follow reflect changes that have occurred through the season as a result of the errata. These pages are the *official* versions, and should be used during trial (e.g. when refreshing a witness' recollection)

For explanations regarding what has been modified, please consult the errata above.

judge. These completed ballots will be given to the judges at the pre-trial conference.

8. Pre-trial Conference (10 minutes)

Student attorneys will participate in a pre-trial conference with the judicial panel. Teachers, legal advisors and/or designated adult supervisors are encouraged to attend.

Permitted During Pre-Trial:

- a. Discussing whether teams have permission to film
 1. Have all photo releases been signed and marked as yes?
- b. Questions related to judicial preferences (e.g. should attorneys stand when making objections, waiting to respond after objections, etc.)
- c. Questions related to mobility (e.g. can attorneys move about the well of the courtroom?)
- d. Discussing accommodations or modifications approved by OCLRE (e.g. our second witness requires braille text, which has been provided for use)
- e. Providing completed scoresheets to judges

Prohibited During Pre-Trial:

- a. Giving judges copies of any trial material (including but not limited to trial binders, laminated exhibits, copies of witness statements, etc.)
 1. Judges receive materials from OCLRE. Additional items to be considered should be shown to the bench at the time it is raised during trial, in the same format indicated in the rules (e.g. clean, unmarked, unaltered copies).
- b. Oral case summaries from either team
 1. Judges receive a case summary and errata summary from OCLRE.
 2. Any presentation of facts or evidence should occur during the trial itself through statements or witness testimony.
- c. Making of motions or seeking judicial notice of any item (including but not limited to declarations of expert witness status, voir dire of witnesses, motions to separate witnesses, etc.)

9. Opening the Court

When the judges enter the courtroom, the bailiff opens the court by saying:

“All rise. Hear ye, hear ye, the U.S. District Court for the Middle District of Ohio [or whatever the name of the court may be], Mock City, Ohio [or whatever town in which the court is located] is open pursuant to adjournment. All having business before this honorable court draw near, give attention, and you shall be heard. You may be seated.”

10. Opening Statements (4 minutes' maximum per statement)

- a) The presiding judge should ask counsel for Prosecution to make an opening statement. Prosecution counsel should introduce

themselves and their team members and the roles they are playing and then present the opening statement. The same procedure is used with Defense counsel. The timekeeper will stop and then reset the stopwatch to zero after opening statements.

- b) An opening statement has been defined as “a concise statement of [the party’s] claim [or defense] and a brief statement of [the party’s] evidence to support it.” Judge Richard M. Markus, *Trial Handbook for Ohio Lawyers* (Thomson-West, 2006 Edition), §7:1, p. 305. A party seeking relief should indicate the nature of the relief sought. It may be useful to acknowledge the applicable burden, or burdens, of proof. An opening statement is not supposed to be argumentative and should be used by attorneys to present their theories of the case. Legal authorities can be cited, to show what issue or issues are before the court for decision. It is appropriate to lay out what the attorney expects the evidence will show, but the wise attorney will be conservative in this regard.
- c) The most important aspect of the opening statement is to frame the issues. The attorney wants to frame the issues so that there is a compelling narrative (the theory of the case) in their client’s favor into which all the favorable facts and all favorable legal authority neatly fit. A well-crafted opening statement tells a story that will dominate the trial that follows.

11. Swearing in the Witnesses

- a. The bailiff swears in with:
“Will all witnesses and parties who are to give testimony in these proceedings please step to the front?”
- b. Then the bailiff holds up their right hand and says:
“Please raise your right hand. Do you solemnly swear that the testimony you are about to give is the truth, the whole truth, and nothing but the truth and your testimony will comply with the Rules of the Ohio Mock Trial Competition?”
- c. All witnesses will remain in the courtroom but will be deemed constructively separated. Therefore, it should be assumed that witnesses are unaware of prior trial testimony and no motion for separation of witnesses shall be necessary.

12. Testimony of Witnesses (Direct/Re-direct 20 minutes; Cross/Re-Cross 18 minutes)

- a. Counsel for the Prosecution and Defense will each call two witnesses. Prosecution attorneys must call Prosecutions witnesses and Defense attorneys must call Defense witnesses.
- b. Counsel for Prosecution will present their case first. The presiding judge will ask counsel for Prosecution to call the first witness. The witness will then testify in the following examination sequence:
 - o Direct
 - o Cross
 - o Re-Direct
 - o Re-Cross

When Prosecution counsel calls the second witness, the witness will be called to the stand and the procedure repeated.

- c. The presiding judge will then ask counsel for the Defense to call their first witness. The Defense follows the same procedure as the Prosecution.

Witnesses are bound by their written statements.

- e. Witness statements may be used by counsel to impeach a witness or refresh a witness's memory in accordance with the Simplified Rules of Evidence. Witnesses may not, however, bring witness statements or notes to use as a trial aid during testimony.
- f. Fair extrapolations are permitted only during cross-examination if they are (i) consistent with the facts contained in the case materials and (ii) do not materially affect the witness's testimony. If a witness invents an answer that is likely to affect the outcome of the trial, the opposition may object. **Teams that intentionally and frequently stray outside the case materials will be penalized.**
- g. If an attorney who is cross-examining a witness asks a question, the answer to which is not included in the witness's written statement or deposition, the witness is free to "create" an answer provided it is responsive to the question, does not contain unnecessary elaboration beyond the scope of the witness statement, and does not contradict the witness statement.

13. Exhibits:

All exhibits contained in the case materials are stipulated as admitted. Only exhibits that are part of the case materials may be used. If used, the exact page from the case materials may be reproduced on 8½ x 11 paper, but not bound in plastic or modified in any way. The trial proceedings are governed by the Simplified Rules of Evidence found in this casebook.

14. Closing Arguments (5 minutes maximum each, with an additional 2 minutes Prosecution rebuttal)

- a) The presiding judge will allow attorneys two minutes (no longer) before closing arguments to incorporate results from cross or to collect their thoughts. During this time the timekeepers will stop both stopwatches and reset to zero. No one shall leave the courtroom and all rules on communication during the trial prevail. The presiding judge will ask Prosecution's and Defendant's counsel if they are ready to present closing arguments. Counsel for Prosecution will present their closing argument first, followed by the Defense's closing argument. Counsel for Prosecution has the option for a two-minute rebuttal after the Defense's closing argument. These two minutes do not have to be requested in advance. The optional rebuttal is limited to the scope of the Defense's closing argument.
- b) Closing statements, "are permitted for the purpose of aiding the [finder of fact] in analyzing all the evidence and assisting it in determining the facts of the case." Markus, op. cit., §35:1, at p. 1013. In a bench trial (to a judge, rather than to a jury), the closing statement is also the time to argue the law to the judge.
- c) The attorney should point out to the court that their side has proven everything that it promised to prove, while pointing out that the other side failed to prove what it promised it would. It can now be

**IN THE COURT OF COMMON PLEAS, BUCKEYE COUNTY, BUCKEYE
CRIMINAL DIVISION**

State of Buckeye,	:	
		Case No. 18 CR 1234
Plaintiff,	:	
vs.	:	
Quinn Wolf,	:	
Defendant.	:	

ORDER

This matter is before the Court on the Motion of Defendant to suppress evidence obtained or derived from, through or as a result of Harmony Police’s alleged unlawful search and seizure of Defendant’s property. A motion hearing is scheduled to begin on January 18, 2019 and shall continue day to day until completion.

SO ORDERED

Judge Strickland

**IN THE COURT OF COMMON PLEAS
BUCKEYE COUNTY, BUCKEYE**

STATE OF BUCKEYE	:
	: CASE NO. 18 CR 1234
Plaintiff,	:
	: Judge Strickland
-vs-	:
	: EVIDENTIARY HEARING REQUESTED
QUINN WOOLF,	:
	:
Defendant.	:

MOTION TO SUPPRESS

Now comes Quinn Woolf, by and through counsel, and hereby moves this Honorable Court for the suppression and exclusion of all evidence, physical and testimonial, obtained or derived from or through or as a result of Harmony Police’s unlawful search, seizure, interrogation, arrest, and detention. Specifically, Defendant Woolf moves for the suppression and exclusion of the following:

Any and all items of physical evidence allegedly seized from Defendant Woolf, including, but not limited to, the laptop and journal, which was unlawfully seized by Harmony police.

This motion is supported by the attached memorandum, witness testimony, and all other evidence deemed necessary by this Court.

Respectfully submitted,

/s/ Daniel Kafee
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MEMORANDUM IN SUPPORT

Introduction

This case is simple: The State of Buckeye violated Defendant Woolf's Constitutional rights and is now seeking to evade the repercussions of the violation by pointing to the contractor the government hired to invade Defendant Woolf's rights and, in effect, insulate the government from these very Constitutional violations. However, Defendant Woolf now respectfully requests this Court to prevent the State of Buckeye from obfuscating the Constitution and suppress the evidence unlawfully obtained by the State of Buckeye through Omniscient.

Facts

This motion arises out of an unlawful search and seizure by the State of Buckeye and Omniscient Technologies, LLC ("Omniscient"). In August of 2018, Omniscient was hired by the City of Harmony to obtain video footage of 500 acres of state-owned farmland in preparation for commercial development. On August 24, 2018 Omniscient's sole owner and CEO, Eli Moss, flew a DJI Matrice 600 Pro ("Matrice Pro"), which is a \$4,999.00 advanced unmanned aircraft with extraordinary capabilities not normally found in an ordinary consumer drone. To be sure, the Matrice Pro has the following main features: (1) A3 Pro Flight Controller; (2) Complete Integration Systems; (3) Six Battery Capability; Aerial Imaging Solutions; (4) Extended Flight Time and Transmission Range; and (5) Professional HD Transmission. Moreover, the Matrice Pro is capable of carrying over 13 pounds in payload along with a three-mile transmission range and flight time of up to 110 minutes.

Eli Moss flew the Matrice Pro on numerous prescribed paths (set forth in his contract with Harmony) over the land marked for surveillance. Throughout this surveillance, the Matrice Pro was flown at and around 400 feet in violation of the applicable Federal Aviation Agency's regulations. Additionally, the Matrice Pro's camera captured intimate video footage of the backyard of the Woolf residence, which abuts the state-owned land.

delegated a public function by the State;² (3) when it is “entwined with governmental policies,” or when government is “entwined in [its] management or control.”³

Here, it is clear from the relationship between Omniscient and the state that a sufficiently close nexus existed so that the acts of Eli Moss and Omniscient were actually the acts of the state. To be sure, Omniscient entered into a contract with Harmony for the survey and footage of the Farmland. The contract shows the intertwined relationship between Omniscient and the state. Further, it is axiomatic from the contract that the government exerted extensive control, dominion, and management of Omniscient's activities. Finally, it is clear from the contract that the City of Harmony retained possession of any footage captured by Omniscient for the purpose of criminal investigations.

Accordingly, it is obvious from the contractual relationship between Omniscient and the City of Harmony that the state exerted management and control over the operations of Omniscient herein. Thus, Omniscient operated as a state actor under the color of law as soon as the drone set flight and began capturing footage for the sole purpose and use of the state. Therefore, when Omniscient violated Defendant Woolf's Fourth Amendment rights, the State of Buckeye violated Defendant Woolf's Fourth Amendment rights.

B. Omniscient and the State of Buckeye Used Technology That Was Not Readily Available To The Public To Spy On The Woolf Family And Violate Defendant Woolf's Privacy.

In *Kyllo*, the Supreme Court of the United States held that a person's Fourth Amendment rights are violated when otherwise constitutionally protected information is obtained by sense-enhancing technology that is not in "general public use." *Kyllo v. United States*, 533 U.S. 27, 34–35, 121 S.Ct. 2038, 2043, 150 L.Ed.2d 94 (2001). To be sure, the Court further stated that such a holding "assures preservation of that degree of privacy against government that existed when the Fourth Amendment was adopted." *Id.*

² See, e.g., *West v. Atkins*, 487 U.S. 42, 56, 108 S.Ct. 2250, 2259, 101 L.Ed.2d 40 (U.S. 1988); *Edmonson v. Leesville Concrete Co.*, 500 U.S. 614, 627–628, 111 S.Ct. 2077, 114 L.Ed.2d 660 (1991).

³ *Evans v. Newton*, 382 U.S. 296, 299, 301, 86 S.Ct. 486, 15 L.Ed.2d 373 (1966).

In August 2018, Eli Moss began fulfilling Omniscient’s part of the contract. Per the reasonable guidelines of the contract, Eli Moss created a plan and began flying the drone in order to take images of the entire property. While capturing the farmland, Eli Moss was careful to comply with FAA rules for the operation of commercial drones. Eli Moss noted there was residential property adjacent to the farmland which was also captured during the flyover. Eli Moss provided the images to the City of Harmony for use in its project and kept a copy consistent with accepted business practice.

Omniscient Technologies had captured some images of Quinn Woolf’s house and the CEO, Eli Moss, was willing to share this information with the Harmony Police Department. Eli Moss pulled up several drone images of the Woolf residence and had technology engineers enhance the video footage. Eli Moss shared these images with Detective Miller and turned them over for use in the theft investigation.

The images recovered by Omniscient Technologies were taken on August 24, 2018. These images showed a teenager sitting under a gazebo with a laptop and notebook on the table. The gazebo contains a five-foot gap for ingress and egress, making objects inside the gazebo visible to the open air. Viewing the enhanced or zoomed in version of the images, a string of alphanumeric characters was visible on the notebook page, which matched the initial characters alphanumeric key provided by Sam Stone to access the pension fund.

Based on this information, the Harmony Police Department sought and received a search warrant for the Woolf residence, including all electronics. On September 28, 2018, the search warrant was executed and the laptop seized. As a result, Quinn Woolf was charged with the theft of \$120 million from Buckeye Public Employee Pension Fund.

II. Law and Argument

- a. The collection of drone photographs and/or video was done by a private business and therefore does not constitute state action.*

facilities when possible and state power of approval on hiring of vocational counselors did not constitute state action in *Rendell-Baker* and *Blum*. Here, there are government regulations related to flying that Omniscient Technologies must follow. However, these government regulations are not specific to Omniscient Technologies, rather to any commercial entity flying drones. The contract signed between the City of Harmony and Omniscient was the opposite of “extensive and detailed” as it did not specify a flight plan for Omniscient to follow when taking the images of the farmland. This factor again shows Omniscient was acting as a private entity when collecting the images in question.

A private entity can only be a state actor if the public function that it performs is “traditionally the exclusive prerogative of the state.” *Jackson, supra.* at 353. Courts will not find a state action solely because the private entity performs a function that serves the public. Surveying or collecting drone images of property is not a function traditionally performed exclusively by the state. Rather, the state routinely hires private companies to perform that function for the state. Taking photographs and videos from a drone camera is not a public function like education. Even in *Jackson*, the court found that a school providing education for students unable to be served by traditional public schools was not a state actor. This Court has even more evidence here to find collecting images to survey government land is not state action.

Private entities that lack a “symbiotic relationship” with the state will not be found to be state actors. *Rendell-Baker, supra.* at 842-843 citing *Burton v. Wilmington Parking Authority*, 365 US 715 (1961). In *Burton*, a restaurant located within a public parking garage paid rent to support the garage and was found to be a state actor when it refused to serve African-Americans and there was evidence the state profited from the restaurant’s discrimination. Here, there is no evidence the state profited in any way from Omniscient Technologies taking images of residential property abutting the farmland. There is no evidence of a symbiotic relationship between Omniscient Technologies and Harmony, rather it’s the same type of relationship Omniscient Technologies has with all of their clients.

75 low over their own fields, so there's really no reason for them to be anywhere near our backyard.
76 There's a big vacant field next door that I think the city owns, but last time I checked people
77 don't spend time flying crop dusters to fertilize a big patch of weeds! Thankfully the balloon
78 festival only comes around for one month out of the year, so I know when to avoid it, and
79 otherwise I get my fortress of solitude all to myself!

80 August 24 was just like any other day. I was sitting in my favorite chair trying to crack
81 another code. This one happened to be the whopping 24-digit alphanumeric code that Avery
82 gave me. Sometimes when I'm stuck on a code, I'll write down some famous quotes to help get
83 my mind working. I'm a big fan of Niccolo Machiavelli, and one of my all-time favorites is his
84 saying that "*whosoever desires constant success must change his conduct with the times.*" I've
85 written that one so many times that it's practically implanted in my brain. Avery really liked it
86 too, and we would usually use a Machiavelli quote to tip each other off that there was a cipher
87 hidden somewhere in a message. That's what I thought he was trying to do with that snap of the
88 sticky note on his phone. Another one of my favorite quotes by Machiavelli is: "*Never was*
89 *anything great achieved without danger.*" I've probably written that one in my notebook a few
90 dozen times.

91 I never did crack the 24-digit code, and I'm not sure it was actually a code. A few weeks
92 after August 24, the police came and confiscated my journal with the code written on it. I was
93 pretty sad about having the notebook taken away because it contained several of my unique secret
94 codes and a lot of my favorite quotes. It's going to take a while to compile all of those codes and
95 quotes again.

96 Anyway, it turns out that that scumbag Eli Moss has it in for me. Eli and my family go
97 way back, and not in a good way. Eli is one of those people who thinks the rules don't apply.
98 My dad first encountered Eli in college, when both of them were running for class president. The
99 election was expected to be pretty close, so Eli started spreading lies about my dad and how he
100 had plagiarized a paper and been caught cheating. None of it was true, but Eli was able to sway

STATEMENT OF DR. PARKER MONROE

Unmanned Aerial Vehicle Technology Expert - Defense

1 Hello everyone, I am Dr. Parker Monroe. I am currently practicing as an unmanned
2 aerial vehicle (UAV) and robotics expert with over 10 years of experience in unmanned robotic
3 research including architectures, algorithms, and perception.

4 I guess you could say that I've always been somewhat of a geek. Ever since I was a
5 child, I have been interested in electronics and robotics. I think it all started when I was a
6 toddler. My favorite toy was the Playskool Alphie II. He was this weird little robot that taught
7 the basic A-B-Cs and 1-2-3s. As I continued to grow, you could bet that you'd see me
8 somewhere in the corner playing with the latest gadget that had come out. Gameboy....
9 PlayStation...you name it, I had my hands on it. Obviously, in high school, I wasn't considered
10 to be "cool," but that didn't stop me from studying and researching. But...oh, what's that
11 saying? "Nerds rule the world?" Yeah, I'd definitely say that's true.

12 I graduated from M.I.T in 2007 with my ScD in Mechanical engineering. I took various
13 classes in robotics that included general training in pneumatics, controlled systems, logic, and
14 microprocessors. During my time in college, I continued to indulge my fascination with
15 technology through entering in many robotics competitions. I personally admired the work of
16 John J. Leonard, a professor of Mechanical and Ocean Engineering at MIT who encouraged my
17 work with robotics.

18 Once graduating from college, I began as an entry-level developer for Robotics
19 Process Automation (RPA) where I worked under the supervision of more experienced
20 developers. Once I received more knowledge and understanding, I began working as a Robotics
21 Automation Engineer where I was involved with the design, construction, sale, installation and
22 support of robotic equipment. There, I formulated initial design of control systems, created
23 electrical schematics, and developed bills of material. I would also train customers on proper