

SECOND ANNUAL
GOLD CUP
MOCK TRIAL COMPETITION
2024



EXHIBITS

2024

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5 SUPERIOR COURT OF CALIFORNIA,
6 COUNTY OF GOLD

8 THE PEOPLE OF THE STATE OF CALIFORNIA,)
9 Plaintiff,)

Case No. 24FE187187

10 vs.

JOINT EXHIBIT LIST

11 ADRIANA GARCIA

12 Defendant)
13

EXHIBIT NUMBER	DESCRIPTION
1	Handwritten note from Jordan Avery
2	Human skull
3	911 Call
3A	Transcript of 911 Call
4	Scene Diagram
5	Gold County Crime Lab DNA Report
6	2018 Danny Lee Police Report
6A	2023 Danny Lee Supplemental Police Report
7	Single Photograph of 1426 F Street
8	Single Photograph of shoe and bone in a shallow grave
9	Single Photograph of a body being removed from the yard
10	Single Photograph of crowd and removed dirt from the yard
11	Single Photograph of 3 officers digging to unearth bodies
12	Single Photograph of one of the shallow graves
13	Single Photograph of second grave located in the yard
14	Single Photograph of backhoe being used to locate additional graves
15	Single Photograph of Arlo
16	Single Photograph of shovel found at the scene
17	Single Photograph of prescription medications found at 1426 F Street
18	Lab Report re: body identifications
19	Bank Records Forensic Summary
20	Single Photograph of 1424 and 1426 F Street

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21	Business Card of Ryan Roebuck
22	Certified RAP of Celeena Winston
23	Certified RAP of Ryan Roebuck
24	Certified RAP of Adriana Garcia
25	Certified RAP of Jordan Avey
26	Letter purported to be from Brandon Jack
27	Text messages on Adriana Garcia's phone
28	Missing Persons Report
29	Property Booking Sheet
30	Single Photo of Handsaw with Red Substance

I need to tell
someone the truth
but I'm afraid to

24FE157187
EXHIBIT 1

1 People vs. Adriana Garcia (Case#: 24FE187187) DATE:11/1/23

2 911 CALL of CELEENA WINSTON TIME:4:34PM

3 =====

4 OPERATOR: 911

5 GPD: Hi this is Gold PD with a transfer. She is
6 calling from 1424 F Street and has located
7 human remains. Go ahead.

8 OPERATOR: Hi ma'am.

9 CELEENA W. Yes. Hello?

10 OPERATOR: Hi so what is going on?

11 CELEENA W. I'm not really sure. I didn't know who to
12 call or what to do. I think my dog dug up a
13 human skull from the yard next door.

14 OPERATOR: Are you OK?

15 CELEENA W. I'm just really freaked out. What if my
16 neighbor killed somebody? I'm totally
17 shaking just looking at it.

18 OPERATOR: Looking at what?

19 CELEENA W. A skull. My dog brought it home from my
20 neighbor's yard. It's all dirty like it was
21 buried and my dog dug it up. Please just
22 send someone to help! I'm out on my porch
23 and I'm afraid of what might happen if she
24 hears me calling you.

25

24FE187187
EXHIBIT 3A

1 OPERATOR: Who is she?
2 CELEENA W. My next door neighbor, Adriana Garcia.
3 OPERATOR: Has she ever given you any reason to be
4 afraid?
5 CELEENA W. Not me personally, but she has threatened to
6 hurt my dog. I don't have any evidence, but I
7 think she or her creepy handyman may have
8 done something to one of her tenants, Brandon
9 Jack. She claims he left the country but
10 based on my experience with Mr. Jack I know
11 he would never do that. Something strange is
12 going on in that house.
13 OPERATOR: Did you just say something about a creepy
14 handyman?
15 CELEENA W. Yeah. I think his name is Ryan. He gives me
16 the creeps. He is always there doing things
17 for Adriana. But I have sometimes seen him
18 out there in the yard late at night. I
19 wanted to call several times when he was out
20 there digging, but couldn't really find a
21 reason to call the police. It was just really
22 suspicious and I was scared for him to see me
23 watching.
24
25

1 OPERATOR: Officers are on their way and they will look
2 into it? Did you say your dog brought you a
3 skull.
4 CELEENA W. Yeah. It's all dirty and looks like he dug
5 it up in her yard.
6 OPERATOR: Try not to touch it, OK? Just leave it there
7 until the officers arrive and keep your dog
8 away from it.
9 CELEENA W. I will. It looks like the officers are
10 pulling up. What do I do?
11 OPERATOR: You can just flag them down to help you. If
12 you feel safe now, I'm going to hang up.
13 CELEENA W. OK. Thank you!
14 **END OF CALL**

GRAVE #2
A. Dunham

BOARDING HOUSE

1426 F Street
1/30/24

GRAVE #1
Brandon Jack

SHED

GRAVE #4
K. Anderson

GRAVE #5
C. Sinclair

GRAVE #3
M. Moore

GRAVE #6
T. Grimes

GRAVE #7
M. Eixenberger

1424 F
STREET

24FE187187
EXHIBIT 4

14TH STREET

F STREET



GOLD COUNTY LABORATORY OF FORENSIC SCIENCES

SUBJECT: ADRIANA GARCIA

VICTIM: JOHN DOE

1 Trace evidence and DNA testing was performed on the following items booked into evidence by
2 Officer Danny Lee on 11/1/23

- 3
- Potential Human Skull believed to originate 1426 F Street.

4 Although a nearly complete set of teeth were intact within the skull, a search of dental records
5 databases produced no match. In addition, there was insufficient unique structural detail in order
6 to complete a facial reconstruction.

7 The examination of the evidence in this request began on November 2nd 2023 the swabs were
8 extracted for DNA analysis using an EZ1 Robot extraction protocol. The extracts were quantified
9 with the Quantifier Trio DNA quantification kit and amplified with the Promega Powerplex Fusion 6C
10 short tandem repeat (STR) and Y-STR Amplification System. My DNA testing resulted in a single
11 source male profile. The profile was uploaded to the Combined DNA Index System (CODIS). There
12 were no hits to any individuals in the system. This profile is expected to occur in approximately 1 in
13 565,000 individuals.

14 The extract tubes in the remaining DNA extracts will be retained at the laboratory forensic services.
15 The evidence examined in this request will be returned to the submitting agency.

16 **NOTE:** It should be noted that some minor evidence of contamination and DNA transfer were
17 identified on the items prior to testing.

Dated: 11/15/23



Sonia Satchell
Criminalist

LABORATORY OF FORENSIC SERVICES

This report contains the results and conclusions of the signing analyst.
Supporting examination documentation is maintained in the case file.

24FE187187
EXHIBIT 5



POLICE REPORT

1 **8/7/18 (Friday)** I, Deputy Danny Lee #187 was assigned to the Gold County Sheriff's Office
2 Central Patrol Division. I was wearing a full Sheriff's Office Uniform and was driving a fully
3 marked Patrol Vehicle.

4
5 1342 hours: I was dispatched to the Volunteers of America Inebriate Shelter (VAIS) to take a
6 missing persons report. VAIS is a primarily volunteer staffed shelter that focuses on the
7 homeless, elderly and mentally ill members of our county that suffer from severe drug and
8 alcohol dependencies in addition to other underlying problems. The report came from a Social
9 Worker identified as Vanessa Washington. Ms. Washington has been volunteering her time at
10 VAIS for the last several years and during that time had become well acquainted with an
11 individual identified as Brandon Jack. Ms. Washington requested to file a missing persons report
12 for Mr. Jack. Based on the information provided by Ms. Washington, I assisted her in
13 completing a formal missing persons report.

14
15 1552 hours: I responded to 1426 F Street, a boarding house owned by an older woman named
16 Adriana Garcia, where Mr. Jack had been living. Upon arrival I was greeted at the door by Ms.
17 Garcia. She was a very pleasant older woman dressed in a housecoat and slippers. She invited
18 me inside and was willing to answer any questions that I had. She explained that she had
19 operated her home at 1426 F Street as a boarding house for approximately the last 7 years. She
20 primarily took in those that were down on their luck and frequently had mental issues and
21 drug/alcohol addictions. She frequently was sent potential boarders by the Department of Social
22 Services or met them on her own on the street before taking them in. She stated that she
23 operated her boarding house out of compassion for those that were less fortunate. She assisted
24 her tenants with their finances and provided meals, housing, and other services for them. She
25 indicated that she often received compensation for her services from those that had an income
26 stream of some sort, typically Social Security.

27
28 The house was tidy and there were several tenants milling about. I briefly spoke to one of the
29 tenants, Jordan Avey, who indicated that she hadn't seen Mr. Jack for several weeks and believed
30 he may have gone to Canada. When I tried to ask her further questions, she shut down and began
31 shaking her head and mumbling to herself incoherently while pounding her fists on the table.


24F187187
EXHIBIT 6

1 I was shown to Mr. Jack's room by Ms. Garcia. Clothes were in the closet and drawers and
2 multiple duffle bags were on the floor of the closet. There was nothing to immediately indicate
3 that Mr. Jack had left town. When I asked Ms. Garcia about it, she simply stated that Mr. Jack
4 had been gone since the end of July. She further stated he told her he was going to Canada to
5 visit relatives. She said he needed money to travel and had told her that he would not be able to
6 pay her anything at the moment.

7
8 1730 hours: I provided both Ms. Garcia and Ms. Avey with my card and asked them to call me
9 when they next heard from Mr. Jack. As I passed my card to Ms. Avey she slipped a small note
10 into my hand. I later glanced at the note and saw that it said "I need to tell someone the truth but
11 I'm afraid to." A copy of the note, marked as Exhibit 1, was later booked into property. I
12 dismissed it given Ms. Avey's obviously poor mental state. I then took a quick walk around the
13 outside of the premises. The house was well tended and Ms. Garcia appeared to be doing some
14 renovations and upgrading her landscaping. I gave my business card to the young man, Ryan
15 Roebuck, working in the yard and asked him to call me if he saw Mr. Jack. He stated that he
16 would call if he saw him and provided me with his business card and he wrote his phone number
17 on the back. Exhibit 21. I concluded that Mr. Jack had simply left the house, likely going to
18 visit family. I departed the scene and never heard anything further with regards to Mr. Jack.

End of Report

Dated: 11/7/18


Deputy Danny Lee - Badge #187



POLICE REPORT

1 **11/1/23 (Wednesday)** I, Deputy Danny Lee #187 was assigned to the Gold County Sheriff's
2 Office Central Patrol Division. I was wearing a full Sheriff's Office Uniform and was driving a
3 fully marked Patrol Vehicle.

4
5 1125 hrs: I was dispatched to 1424 F Street regarding the possible location of a human skull.
6 1424 F Street is a two story home owned by Celeena Winston. Upon arrival I immediately
7 contacted Ms. Winston on her front porch. Seated next to her was a large brown dog. Ms.
8 Winston indicated that her dog, Arlo, had run up to her on the porch with something in his
9 mouth. Upon inspection she saw that it appeared to be a dirty human skull. Initially she was
10 unconcerned given that the night before was Halloween. However, as she looked at it more
11 closely, she realized that it may be real and called 911. I booked the 911 call recording and the
12 associated transcript into evidence as Exhibits 3 and 3A. She indicated that the only places her
13 dog had access to were both her yard and the neighbor's yard through a small hole in the fence.

14
15 After putting on plastic gloves I picked up the skull and placed it into an evidence bag, marked
16 as Exhibit 2, to be logged into the evidence room back at headquarters before being sent to the
17 Crime Lab for testing. Ms. Winston was cooperative and agreed to provide a full statement once
18 the testing was completed.

19
20 **11/15/23 1000hrs:** I received a call from the Gold County Crime Lab informing me that they had
21 completed testing on the skull received from Ms. Winston. In summary, the lab confirmed that
22 the skull was human and they had developed a full DNA profile. That profile was uploaded to
23 the Combined DNA Index System (CODIS). Unfortunately, there were no matches in the system
24 and our victim was reclassified as a John Doe. I booked the DNA report into evidence as Exhibit
25 5.

26
27 **12/15/23 1030 hrs:** I went to the Crime Lab to pick up the skull, the DNA swabs obtained from
28 the skull and the associated paperwork generated by the lab. I placed all the materials into the
29 trunk of patrol vehicle in order to transport it back to headquarters and to be booked back into
30 Property. At this point I had no additional leads and needed to find a way to proceed on the case.

31
32 I had recently heard of the forensic technique known as Investigative Genetic Genealogy (IGG).
33 Utilizing IGG it is possible to determine the identity of a suspect or John Doe victim even when

1 no matches are found in the DNA database. The Gold County District Attorney's Office has a
2 Cold Case Unit that specializes in IGG. I contacted the unit supervisor, Keith Hill, and they
3 agreed to take on the case. A copy of my file was provided to the team so that they could attempt
4 to identify our John Doe.

5
6 **1/30/24 0900hrs:** I received a call from Mr. Hill at the District Attorney's Office. He told me
7 that they were successfully able to determine the identity of my John Doe. I was told the skull
8 belonged to a man named Brandon Jack. That name immediately rang a bell with me as a
9 missing persons case I had worked on several years ago from Adriana Garcia's boarding house
10 right next door to Ms. Winston. I have always had a bad feeling about that case and was anxious
11 to continue my investigation with the new evidence.

12
13 1330 hrs: I returned to 1426 F Street to continue my investigation into the disappearance of
14 Brandon Jack. Exhibit 7 is a photograph of the home at 1426 F Street. I knocked on the door
15 and waited several minutes for it to be answered. When Ms. Garcia answered the door she
16 seemed to have aged significantly over the last 5 years. She gruffly said "What do you want? I
17 told you I'd let you know if he ever came back." I asked to come in and briefly speak with her
18 and she opened up the door and stepped aside.

19
20 I asked Ms. Garcia if she had heard from Brandon Jack since he was reported missing in 2018.
21 She indicated that she had received a letter from him about a month after he left for Canada, but
22 had had no other communication with him. When asked to produce the letter she responded that
23 she would look around and let me know if she found it. She later provided me with the letter and
24 I booked it into property as Exhibit 26.

25
26 I asked Ms. Garcia for permission to look around outside and she responded saying "Do what
27 you gotta do." Upon entering the yard, I could see a gap in the fence where the Winston's dog
28 Arlo could apparently move freely between the two yards. Several feet inside the fence I could
29 see an area of disturbed dirt. Protruding slightly out of the dirt was a small white object. Upon
30 further inspection I saw what appeared to be a shoe with a small bone sticking out nearby. CSI
31 photographed the items as Exhibit 8. As I brushed the dirt away it was clear that there were
32 many bones in the area. I backed away and cordoned off the area to keep the quickly forming
33 crowds away from the scene. Exhibit 10 is a photo of the crowds. CSI responded to the area and
34 began to excavate the site. In a matter of hours they had located a nearly complete skeleton
35 wrapped in what appeared to be remnants of a rug. The condition of the skeleton indicated to me
36 that the body may have been dismembered prior to burial. The only thing missing was the skull
37 which was likely the one found by Arlo. As work continued in the yard, I could see Ms. Garcia
38 standing at the upstairs window watching.

39
40 **1/31/24 (Monday)** I returned to 1426 F Street with a team of 8 detectives as well as 3 CSI
41 officers to continue to search the yard for additional evidence. Exhibit 7 is a photograph of the
42 home at 1426 F Street. The area was thoroughly searched both visually and with metal probes. I
43 went to the area of the yard where I had seen work being done back in 2018. Within a matter of

1 minutes, I discovered another shallow grave with another skeleton in a fetal position.
2 Throughout the day a total of 7 bodies were found buried in the yard including Mr. Jacks. It was
3 apparent that Ms. Garcia was concerned about what we were finding based on the look on her
4 face as she watched from the upstairs window. Exhibits 9-14 are photos taken by CSI during the
5 search for bodies with true and accurate descriptions of the contents of the photos.

6
7 In the corner of the yard was a small shed. As I went into the shed, I could see that it was filled
8 with gardening tools including a shovel. I collected the shovel as evidence and had CSI take a
9 swab of the handle for potential contact DNA. Exhibit 16 is a photograph of the shovel. I put
10 the shovel and swabs into my trunk for safekeeping. As I was returning to the yard, I stopped to
11 talk to one of the other officers that was keeping the quickly forming crowds away from the
12 scene. Apparently, word had gotten out that multiple bodies were being pulled from the yard.
13 The officer asked me if we were planning to arrest Ms. Garcia when she got back. When I asked
14 him what he meant, he told me that Ms. Garcia had stepped away to go get coffee because the
15 crowds were making her anxious. He noted how sweet she had been to offer to bring him and
16 the other officer's coffee as well. Not surprisingly, Ms. Garcia never returned. I immediately put
17 out an APB for Ms. Garcia and returned to the yard.

18
19 As the bodies were pulled from the graves, they were put into body bags and hauled away on
20 stretchers. While on scene the coroner noted that the bodies did not appear to have any signs of
21 outward trauma. He speculated that he would need to take tissue samples to determine if they
22 may have been drugged. After hearing this I went into the home and conducted a further search
23 for any potential poisons. I found evidence of multiple bottles of narcotics and other items that
24 could have acted as poisoning agents. Notably, there was a large supply of Dalmane, a
25 prescription sleeping medication, which were prescribed to Ms. Garcia. I photographed one of
26 the bottles in place. Exhibit 17. I later learned that Dalmane is toxic and potentially deadly,
27 especially when combined with alcohol.

28
29 At the end of my shift, I went to Property to book in the shovel and swabs. When I opened my
30 trunk to grab the evidence, the trunk was empty. I have no idea what happened to it. That whole
31 day was a blur, and I was caught up in the excitement of being involved in what was clearly
32 going to be a high-profile case. It would make my career and almost certainly get me a
33 promotion to detective. I was devastated at the loss of the evidence. After I notified my sergeant
34 the next day that the evidence was gone, I was placed on two weeks leave without pay.
35 Thankfully CSI had taken photos of the evidence. Exhibit 16.

36
37 **2/16/24 (Friday) 1130hrs** I received a lab report from the Gold County Crime Lab concerning
38 the six additional bodies located in the yard. Each of the bodies had been identified through the
39 use of dental records, DNA and fingerprints. A copy of the lab report is attached as Exhibit 18. I
40 did a quick background check and located basic information for each of the individuals as
41 follows:

- 42 • TeriAnn Grimes – 57 year old female tenant beginning in August 2015
- 43 • Megan Eixenberger – 62 year old female tenant beginning in December 2017

- 1 • Kristen Anderson – 49 year old female tenant beginning in March 2018
- 2 • Matthew Moore – 71 year old male tenant beginning in July 2020
- 3 • Casey Sinclair – 65 year old female tenant beginning in March of 2021
- 4 • Alison Dunham – 66 year old female tenant beginning in July 2022

5
6 Subsequent investigation revealed that all of the above victims had significant mental health
7 problems as well as drug and/or alcohol addictions. Prior to moving into the boarding house
8 they were either homeless and living on the streets or temporarily housed in local shelters.
9 Grimes, Anderson and Dunham were placed at the boarding house by Social Services, while it
10 appears that Eixenberger, Moore and Sinclair were befriended by Ms. Garcia at the Zebra Club
11 and brought back to the home.

12
13 I obtained certified bank records for Ms. Garcia for the period of 2015-2022. I had the records
14 analyzed by our High Tech Crimes Unit, who subsequently prepared a report attached as
15 EXHIBIT 19. I reviewed the report and found that it confirmed my hunch that Ms. Garcia had
16 been siphoning funds from each of the victims. The total amount exceeded \$750,000. It did not
17 appear that any of the victims had bank accounts.

End of Report

Dated: 11/7/18


Deputy Danny Lee – Badge #187





24F187187
EXHIBIT 8

24FE187187
EXHIBIT 9





24J E187187
EXHIBIT 10





24FL187187
EXHIBIT 13





24FE167187
EXHIBIT 14



14FE187187
EXHIBIT 15



24FEB2018
EXHIBIT 4



GOLD COUNTY LABORATORY OF FORENSIC SCIENCES

SUBJECT: ADRIANA GARCIA

VICTIMS: BRANDON JACK / TERIANN GRIMES / MEGAN
EIXENBERGER / KRISTEN ANDERSON / MATTHEW MOORE
CASEY SINCLAIR / ALISON DUNHAM

1 **IDENTIFICATION OF REMAINS**

2 DNA testing, dental records comparisons and fingerprinting (where possible) were performed on
3 the following bodies received at the Gold County Coroner's Office on 11/3/23.

4 The DNA examination of the above evidence began on November 4th 2023. Tissue samples from
5 the bodies were extracted for DNA analysis using an EZ1 Robot extraction protocol. The extracts
6 were quantified with the Quantifier Trio DNA quantification kit and amplified with the Promega
7 Powerplex Fusion 6C short tandem repeat (STR. For each victim, a single source profile was
8 obtained and uploaded to the Combined DNA Index System (CODIS). Hits were obtained for bodies
9 3, 4 and 7. There were no hits to bodies 2, 5 and 6.

10 **IDENTIFICATION RESULTS**

- 11 • Human body #2 located in a grave at 1426 F Street.
12 ○ Dental records comparison and fingerprinting confirmed the body to be that of
13 TeriAnn Grimes, a 57 year old female. Despite identifying a single source female
14 profile, there was no CODIS hit to the victim's DNA profile.
15
16 • Human body #3 located in a grave at 1426 F Street.
17 ○ DNA testing revealed a single source female profile that was a CODIS hit to Megan
18 Eixenberger, a 62 year old female
19
20 • Human body #4 located in a grave at 1426 F Street.
21 ○ DNA testing revealed a single source female profile that was a CODIS hit to Kristen
22 Anderson, 49 year old female
23
24 • Human body #5 located in a grave at 1426 F Street.
25 ○ Dental records comparison and fingerprinting confirmed the body to be that of
26 Matthew Moore, 71 year old male. Despite identifying a single source mail profile,
27 there was no CODIS hit to the victim's DNA profile.

- 1 • Human body #6 located in a grave at 1426 F Street.
 - 2 ○ Dental records comparison and fingerprinting confirmed the body to be that of
 - 3 Casey Sinclair, a 65 year old female. Despite identifying a single source female
 - 4 profile, there was no CODIS hit to the victim's DNA profile.
- 5
- 6 • Human body #7 located in a grave at 1426 F Street.
 - 7 ○ DNA testing revealed a single source female profile that was a CODIS hit to Alison
 - 8 Dunham, a 66 year old female.

9 **ADDITIONAL TOXICOLOGY AND OTHER FINDINGS**

10 Traditional toxicology screenings were conducted on samples obtained from each of the bodies.
11 The drug classes evaluated include stimulants, narcotic analgesics, sedative hypnotics, muscle
12 relaxants, cannabinoids, hallucinogens, antipsychotics, antidepressants and antihistamines. The
13 following results were obtained:

14 Body #1 – Brandon Jack – the tissue samples tested were positive for trace amounts of Dalmane
15 and multiple antipsychotics. In addition there were positive indicators heart disease and a
16 bacterial infection.

17 Body #2 – TeriAnn Grimes – the tissue samples tested were positive for heroin, multiple
18 antidepressants, and positive indicators for cancer, heart disease and diabetes.

19 Body #3 – Megan Eixenberger - the tissue samples tested were positive for excessive amounts of
20 heroin. Also of note, were positive indicators of advanced stage heart disease and diabetes.

21 Body #4 – Kristin Anderson - the tissue samples tested were positive for Dalmane.

22 Body #5 – Matthew Moore - the tissue samples tested were positive for antipsychotics,
23 methamphetamine, heroine, fentanyl and trace amounts of Dalmane

24 Body #6 – Casey Sinclair - the tissue samples tested were positive for cannabinoids, muscle
25 relaxants, antipsychotics and antidepressants as well as trace amounts of Dalmane.

26 Body #7 – Alison Dunham – In addition to high levels of antidepressants, the body showed evidence
27 of multiple fractures to the ribs and the left wrist as well as a subdural hematoma beneath the
28 occipital lobe.

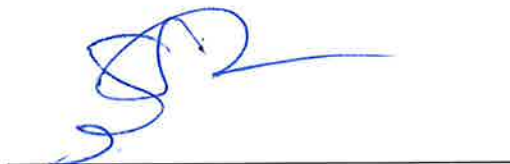
29 If further testing or confirmation is needed, request must be received within 60 days.

30 **NOTE: Dalmane is a benzodiazepine that is used to treat insomnia and/or**
31 **anxiety. Dalmane may cause serious side effects including the following:**

- 32 • confusion, agitation, paranoia, hallucinations;
- 33 • thinking problems, unusual thoughts or behavior;
- 34 • severe daytime drowsiness; or
- 35 • new or worsening depression.

- 1 **Dalmane can slow or stop breathing, especially if you have recently used**
- 2 **an opioid medication or alcohol. MISUSE OF DALMANE CAN CAUSE**
- 3 **ADDICTION, OVERDOSE, OR DEATH.**

Dated: 11/15/23



Sonia Satchell
Criminalist

LABORATORY OF FORENSIC SERVICES

This report contains the results and conclusions of the signing analyst.
Supporting examination documentation is maintained in the case file.

BANK OF GOLD

Bank of Gold
2442 Gold Bar Lane
Gold, CA 95814



I, Jesse Saucedo, am a Manager of the Bank of Gold located at the above address. I am the custodian of records for the Bank of Gold. I was asked to perform a review of the bank records of Adrianna Garcia by the Gold County Sheriff's Office. The following is a summary of the bank account of Adrianna Garcia that was opened in 2015.

DEPOSITS

1. Starting July 2015, Adrianna Garcia began depositing monthly Social Security checks addressed to Jordan Avey in the amount of \$1,500. The last deposit was made on January 1, 2024. Total from these deposits: \$153,000.
2. Starting August 2015, Ms. Garcia began depositing monthly Social Security checks addressed to TeriAnn Grimes in the amount of \$1,500. The last deposit was made on January 1, 2024. Total from these deposits: \$151,500.
3. Starting February 2016, Ms. Garcia began depositing monthly Social Security checks addressed to Brandon Jack in the amount of \$1,500. The last deposit was made on January 1, 2024. Total from these deposits: \$142,500.
4. Starting December 2017, Ms. Garcia began depositing monthly Social Security checks addressed to Megan Eixenberger in the amount of \$1,500. The last deposit was made on January 1, 2024. Total from these deposits: \$109,500.
5. Starting March 2018, Ms. Garcia began depositing monthly Social Security checks addressed to Kristen Anderson in the amount of \$1,500. The last deposit was made on January 1, 2024. Total from these deposits: \$105,000.
6. Starting July 2020, Ms. Garcia began depositing monthly Social Security checks addressed to Matthew Moore in the amount of \$1,500. The last deposit was made on January 1, 2024. Total from these deposits: \$63,000.
7. Starting March 2021, Ms. Garcia began depositing monthly Social Security checks addressed to Casey Sinclair in the amount of \$1,500. The last deposit was made on January 1, 2024. Total from these deposits: \$51,000.
8. Starting July 2022, Ms. Garcia began depositing monthly Social Security checks addressed to Alison Dunham in the amount of \$1,500. The last deposit was made on January 1, 2024. Total from these deposits: \$27,000.

GRAND TOTAL: \$802,500

24FE187187
EXHIBIT 19

NOTABLE WITHDRAWALS

1. On March 1, 2018, Ms. Garcia spent \$35 at Walgreens Pharmacy located at 1234 1st Avenue, Gold, CA, for a prescription of Dalmane.
2. On February 14, 2019, Ms. Garcia spent \$35 at CVS Pharmacy located at 187 Long Shot Road, Gold, CA, for a prescription of Dalmane.
3. On January 2, 2020, Ms. Garcia spent \$35 at Walmart Pharmacy located at 4422 Coast Lane, Gold, CA, for a prescription of Dalmane.
4. On August 1, 2020, Ms. Garcia spent \$35 at Target Pharmacy located at 5693 Ranch Road, Gold, CA, for a prescription of Dalmane.
5. On January 15, 2021, Ms. Garcia spent \$35 at Safeway Pharmacy located at 9013 Morning Street, Gold, CA, for a prescription of Dalmane.
6. On July 6, 2021, Ms. Garcia spent \$35 at Walgreens Pharmacy located at 1234 1st Avenue, Gold, CA, for a prescription of Dalmane.
7. On November 12, 2021, Ms. Garcia spent \$35 at Target Pharmacy located at 5693 Ranch Road, Gold, CA, for a prescription of Dalmane.
8. On February 4, 2022, Ms. Garcia spent \$35 at Walmart Pharmacy located at 4422 Coast Lane, Gold, CA, for a prescription of Dalmane.
9. On May 29, 2022, Ms. Garcia spent \$35 at Target Pharmacy located at 5693 Ranch Road, Gold, CA, for a prescription of Dalmane.
10. On August 3, 2022, Ms. Garcia spent \$35 at CVS Pharmacy located at 187 Long Shot Road, Gold, CA, for a prescription of Dalmane.
11. On November 4, 2022, Ms. Garcia spent \$35 at Target Pharmacy located at 5693 Ranch Road, Gold, CA, for a prescription of Dalmane.

OTHER NOTABLE TRANSACTIONS

Starting June 2015, Ms. Garcia transferred \$150 monthly to an account belonging to Ryan Roebuck. These monthly transfers continued until the last transfer which occurred on November 1, 2023. In addition to the monthly transfers to Mr. Roebuck mentioned above, Ms. Garcia made larger transfers to Mr. Roebuck on the following dates for the provided amounts:

1. October 1, 2015, for \$250.
2. June 1, 2018, for \$750.
3. July 27, 2018, for \$2,000.
4. December 25, 2021, for \$2,000.
5. September 1, 2022, for \$1,000.
6. November 3, 2023, for \$5,000.

Starting in 2015, Ms. Garcia visited the Zebra Club once per month. Starting in 2016, Ms. Garcia began visiting Zebra Club twice per month. Based upon her bank records, Ms. Garcia's last visit to Zebra Club occurred on October 30, 2023.

On February 18, 2024, Ms. Garcia withdrew approximately \$150,000 from her account via cashier's check, leaving her balance at \$0.00.

8/1/24

Jessie Sautels



RYAN ROEBUCK AT YOUR SERVICE

- LANDSCAPING
- PLANTING
- HANDYMAN SERVICES
- ODD JOBS



"LET ME DO THE DIRTY WORK FOR YOU!"

916-217-8724



CRIMINAL RAP SHEET

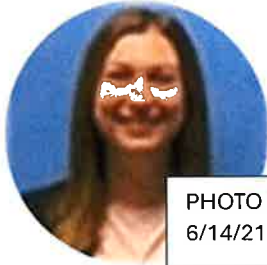


PHOTO DATE
6/14/21

SUBJECT NAME: WINSTON, CELEENA
SSN: XXX-XX-5642
DOB: 5/23/71
SEX: FEMALE
HEIGHT: 5'3"
WEIGHT: 125
ALIAS(ES): N/A

CHARGE #1
WELFARE FRAUD

CHARGE DATE: 3/23/95
SEVERITY: FELONY
DISPOSITION: PLEA
CONVICTION: N/A
MAX SENTENCE: 3 YRS
SENTENCE: 12 MONTHS

CHARGE #3
GRAND THEFT

CHARGE DATE: 11/2/96
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: 12/30/96
MAX SENTENCE: 3 YRS
SENTENCE: 2 YEARS

CHARGE #2
PETTY THEFT

CHARGE DATE: 4/28/96
SEVERITY: MISDEMEANOR
DISPOSITION: GUILTY
CONVICTION: 12/17/98
MAX SENTENCE: 3 YRS
SENTENCE: 180 Days

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EXHIBIT 22



PHOTO DATE
8/14/21

CRIMINAL RAP SHEET

SUBJECT NAME: RYAN ROEBUCK
SSN: XXX-XX-5236
DOB: 5/23/75
SEX: MALE
HEIGHT: 5'11"
WEIGHT: 225
ALIAS(ES): N/A

CHARGE #1

ATTEMPTED MURDER

CHARGE DATE: 7/23/13
SEVERITY: FELONY
DISPOSITION: NOT GUILTY
CONVICTION: N/A
MAX SENTENCE: 15 YRS
SENTENCE: N/A

CHARGE #3

WELFARE FRAUD

CHARGE DATE: 3/2/14
SEVERITY: FELONY
DISPOSITION: DISMISSED
CONVICTION: N/A
MAX SENTENCE: 3 YRS
SENTENCE: N/A

CHARGE #2

ASSAULT CAUSING GREAT BODILY INJURY

CHARGE DATE: 5/19/14
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: 5/30/14
MAX SENTENCE: 3 YRS
SENTENCE: 1 YR

CHARGE #4

FELON WITH A FIREARM

CHARGE DATE: 9/22/16
SEVERITY: FELONY
DISPOSITION: GUILTY PLEA
CONVICTION: 11/22/16
MAX SENTENCE: 3 YRS
SENTENCE: 1YEAR OUT OF
CUSTODY WEEKEND WORK PROJECT



CRIMINAL RAP SHEET



PHOTO DATE
1/14/22

SUBJECT NAME: GARCIA, ADRIANA
SSN: XXX-XX-5874
DOB: 3/16/64
SEX: FEMALE
HEIGHT: 5'1"
WEIGHT: 105
ALIAS(ES): DONNA JOHANSEN

CHARGE #1
PROSTITUTION

CHARGE DATE: 8/23/95
SEVERITY: MISDEMEANOR
DISPOSITION: GUILTY
CONVICTION: 1/7/96
MAX SENTENCE: 1 YRS
SENTENCE: 90 DAYS

CHARGE #3
FRAUD

CHARGE DATE: 3/2/03
SEVERITY: FELONY
DISPOSITION: NOT GUILTY
CONVICTION: 6/2/03
MAX SENTENCE: 3 YRS
SENTENCE: 2 YRS

CHARGE #2
GRAND THEFT

CHARGE DATE: 2/13/98
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: 9/2/28
MAX SENTENCE: 3 YRS
SENTENCE: 2 YR

CHARGE #4
FORGERY

CHARGE DATE: 8/22/12
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: 11/22/12
MAX SENTENCE: 3 YRS
SENTENCE: 2 YRS



CRIMINAL RAP SHEET



PHOTO DATE
9/29/19

SUBJECT NAME: AVEY, JORDAN
SSN: XXX-XX-6257
DOB: 5/23/65
SEX: FEMALE
HEIGHT: 5'6"
WEIGHT: 115
ALIAS(ES): N/A

CHARGE #1

POSSESSION OF HEROIN

CHARGE DATE: 1/23/08
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: N/A
MAX SENTENCE: 2 YRS
SENTENCE: PROBATION

CHARGE #3

ASSAULT

CHARGE DATE: 8/10/14
SEVERITY: FELONY
DISPOSITION: GUILTY
CONVICTION: 11/30/14
MAX SENTENCE: 3 YRS
SENTENCE: 180 DAYS

CHARGE #2

ROBBERY

CHARGE DATE: 2/12/09
SEVERITY: FELONY
DISPOSITION: PLEA
CONVICTION: 9/2/09
MAX SENTENCE: 3 YRS
SENTENCE: 1 YR

CHARGE #4

FALSE INFORMATION TO AN OFFICER

CHARGE DATE: 9/22/19
SEVERITY: FELONY
DISPOSITION: ARREST ONLY
CONVICTION: N/A
MAX SENTENCE: N/A
SENTENCE: N/A

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EXHIBIT 25

September 27, 2018

Adriana -

I am sorry that I took off without letting you know I was gonna leave. I was feeling so sick and I just couldn't think straight. My old demons were back and I needed a drink and to get high. It was the only thing that made me feel better. I know I never talked about them much, but I am with my family in Canada. I don't think I will be coming back. Please say good bye to Celeena and Jordan for me. Thank you again for all you did for me!

Brandon

July 26, 2018 8:57pm

I KNOW ABOUT
YOUR LITTLE SCAM
WITH THE CHECKS!
I THINK A RAISE IS
IN ORDER TO KEEP
IT BETWEEN US.

THE MORE
LANDSCAPING I DO,
THE MORE YOU
NEED TO CUT ME IN
ON THE BACK END.

I ALREADY GAVE
YOU A \$1000 FOR
TAKING CARE OF
THE EXTRA
LANDSCAPING
PROJECTS.
CONSIDER
YOURSELF
LUCKY YOU GOT
THAT MUCH.

THIS IS
BLACKMAIL!
JUST LEAVE ME
ALONE!



MISSING PERSONS REPORT

1
2
3 REPORTING PARTY: Vanessa Washington

4
5 DATE OF REPORT: 8/7/18

6
7 INDIVIDUAL OF CONCERN: Brandon Jack

8
9 RELATIONSHIP: I have known Mr. Jack for the last three years. As a Gold County social
10 worker, I have been assisting Mr. Jack. In addition to assisting him at the VAIS facility I have
11 worked to place him in a safe place back in the community. Approximately two years ago in
12 2016 I was able to secure a placement for him at 1426 F Street, a local boarding house that
13 focuses on the underserved in our community. Over the course of the last few years I have
14 successfully placed several different men and women with the landlady, Adriana Garcia.

15
16 REASONS FOR CONCERN: After placing Brandon at the boarding house, I continued to take
17 an interest in securing his success in the community. To that end I visited him approximately 1-2
18 times a month to check on his progress. Things seemed to be going quite well up until about a
19 month or two ago and I have recently lost contact.

20
21 CONCERNS FOR THE INDIVIDUAL: In addition to mental health issues and drug/alcohol
22 addiction, Brandon lacks some of the basic social skills to survive. I am not sure if he could
23 make it in the community without the help of myself or Ms. Garcia. It would be strange for him
24 take the bold step of striking out on his own. He never completed high school and has no known
25 way to support himself. If it weren't for his Social Security payments, survival on his own
26 would be nearly impossible. He was fortunate to have Ms. Garcia to help him manage his
27 money, keep a roof over his head and food on the table.

28
29 DATE OF LAST CONTACT: 7/25/18 I stopped by 1426 F Street to check up on Mr. Jack. I
30 was informed by his landlord, Adriana Garcia, that he was not there and she suspected that he
31 was drinking again. Mr. Jack was known to frequent the Zebra Club so I went there to look for
32 him. I found him there in a highly intoxicated state. I helped him to my car and drove him back
33 to F Street. Concerned for his wellbeing, I stopped by the boarding house the next day to check
34 on Brandon. He wasn't there and I never heard from him again.

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EXHIBIT 28

1 I have repeatedly tried to call him on his government issued cellphone but there has been no
2 response. I have dropped by several times since then and he isn't there.

3

4 ANY OTHER CONCERNS: I was informed by Ms. Garcia and one of the other tenants, Jordan
5 Avey, that Mr. Jack had gone to Canada to visit his family. I found this to be strange because in
6 all the time I have known Mr. Jack he has never mentioned having any family, let alone any
7 family in Canada. To my knowledge he was all alone in this world with nobody to help him.

8

9

10 LAW ENFORCEMENT ACTIONS TAKEN: Detective Lee conducted an investigation into the
11 disappearance of Mr. Jack which revealed that as of 9/3/18 there have been no sightings of Mr.
12 Jack at the boarding house, Volunteers of America Inebriate Shelter, the Zebra Club or any of the
13 locations he was known to frequent. Nor has he made contact with Ms. Washington or anyone
14 else he was known to previously associate with.

Property Record Number:

Gold County Sheriff's Office
EVIDENCE CHAIN OF CUSTODY TRACKING FORM

Case Number: 24FE187187 Offense: Homicide
Submitting Officer: (Name/ID#) Danny Lee Badge #187
Victim: Brandon Jack
Suspect: Adriana Garcia
Date/Time Seized: 1/31/24 @ 1800hrs. Location of Seizure: 1426 F Street

Description of Evidence		
Item #	Quantity	Description of Item (Model, Serial #, Condition, Marks, Scratches)
1	1	Shovel Seized from Suspect's Shed
2	1	DNA Swabs from Item #1

Chain of Custody				
Item #	Date/Time	Released by (Signature & ID#)	Received by (Signature & ID#)	Comments/Location
1	1/31/24	Danny Lee #187		
2	1/31/24	Danny Lee #187		

APD_Form_#PE003_v.1 (12/2012)

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EXHIBIT 29



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EXHIBIT 30