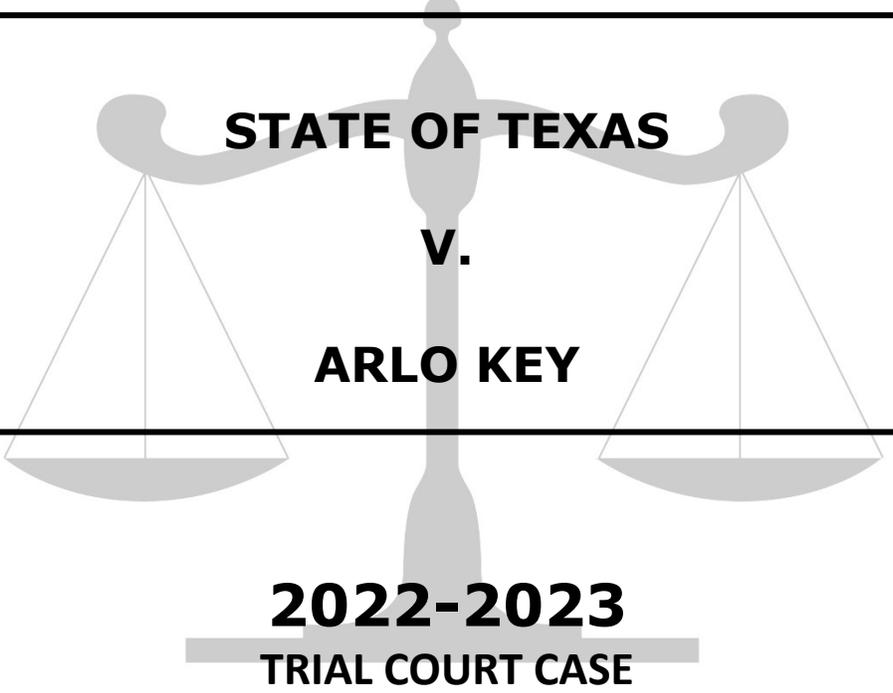


THE CASE OF
"THE WINDSHIELD MURDERER"

A large, light gray silhouette of a pair of scales of justice is centered on the page. The scales are balanced, with two pans hanging from a central beam. The text of the case title is overlaid on the scales.

STATE OF TEXAS

V.

ARLO KEY

2022-2023

TRIAL COURT CASE

Case Materials Written By:

Hon. C. Tyler Atkinson, Judge Denton Municipal Court



TEXAS YOUTH AND GOVERNMENT

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TEXAS YOUTH AND GOVERNMENT

CASE SPECIFIC NOTES, RULES AND STIPULATIONS

- (1) The trial will take place in Bruda County which is in the state of Texas. The trial will be governed by the Rules of Evidence and Procedure posted with the case.
- (2) This case is a fictional adaptation of an original trial. However, the facts contained herein are not presented as historical facts. Outside research would conflict with the facts presented in this case packet. Students may not use information gathered outside of the case packet in their presentations.
- (3) The affidavits have numbered lines for ease of use. For example, on cross-examination, an attorney may reference the page and line number when pointing a witness to a portion of the witness's affidavit.
- (4) The exhibits are pre-numbered. When they are offered into evidence and used as evidence, the exhibits do not have to be associated with one particular litigant. For example, just say "The S offers Exhibit 1" instead of "The State offers State's Exhibit 1."



Provision of Law:

Penal Code Sec. 19.02. Felony Murder. A person commits an offense if they commit or attempt to commit a felony, and in the course of and in furtherance of the commission or attempt, or in immediate flight from the commission or attempt, they intentionally commit or attempt to commit an act clearly dangerous to human life that causes the death of an individual.

Transportation Code Sec. 550.021. Accident Involving Injury or Death. The operator of a vehicle in an accident that results in injury or death of a person shall stop the vehicle at the scene, determine if a person involved in the accident requires aid, provide any person injured reasonable assistance, including making arrangements for transporting the person to a hospital if it is apparent that treatment is necessary. A person commits an offense if the person does not comply with this section. An offense under this section is a felony in the second degree if the accident resulted in the death of a person.

Penal Code Sec. 37.09 Tampering with Evidence. A person commits an offense if, knowing that an investigation or official proceeding is pending or in progress, they alter, destroy, or conceal any record, document, or thing with intent to impair its verity, legibility, or availability as evidence in the investigation or official proceeding. An offense under this section is a felony in the third degree.

Code of Criminal Procedure 2.01 Proof Beyond a Reasonable Doubt. All persons are presumed to be innocent and no person may be convicted of an offense unless each element of the offense is proved beyond a reasonable doubt. A "reasonable doubt" is a doubt based on reason and common sense after a careful and impartial consideration of all the evidence in the case. It is the kind of doubt that would make a reasonable person hesitate to act in the most important of his or her own affairs. The fact that they have been arrested, confined, or indicted for, or otherwise charged with, the offense gives rise to no inference of guilt.



TEXAS YOUTH AND GOVERNMENT

CAUSE NO: 22-123456

STATE OF TEXAS

VS.

ARLO KEY

FELONY INDICTMENT

COUNT ONE: FELONY MURDER

Arlo Key hereinafter called Defendant, in the County of Bruda, State of Texas, on or about the 26th day of October 2021, did then and there intentionally or knowingly commit or attempt to commit a felony, to-wit: FAILURE TO STOP AND RENDER AID as proscribed in Transportation Code 550.021 which is captioned accident involving personal injury or death, and in the course of and in furtherance of the commission or attempt, or in immediate flight from the commission or attempt, Defendant committed or attempted to commit an act clearly dangerous to human life, to-wit: transported Jefferson Doyle to Defendant's home when he was seriously injured and lodged in Defendant's car, or lodged in the windshield of said car, and Defendant secreted him in Defendant's garage which prevented him from receiving medical care, which caused the death of Jefferson Doyle.

COUNT TWO: TAMPERING WITH EVIDENCE

Arlo Key hereinafter called Defendant, in the County of Bruda, State of Texas, on or about the 26th day of October 2021, did knowing that an offense had been committed alter and destroy and conceal a thing to wit: moving victim's deceased and burning defendant's car seat, with intent to impair its verity or availability as evidence in a subsequent investigation or official proceeding for said offense.

AGAINST THE PEACE AND DIGNITY OF THE STATE

SIGNED BY DISTRICT ATTORNEY WIGGINS

SIGNED BY GRAND JUROR FOREPERSON



TEXAS YOUTH AND GOVERNMENT

Affidavits



TEXAS YOUTH AND GOVERNMENT

AFFIDAVIT OF FLETCHER CRUZ

STATE OF TEXAS
COUNTY OF BRUDA

§
§

1 My name is Fletcher Cruz. I am over the age of 18 years, and I am otherwise fully competent to
2 testify. I can read, write and understand the English language. I am not under the influence of any drug
3 or other substance which would prevent me from fully understanding the nature of this affidavit. All of
4 the information in this affidavit is within my personal knowledge and is true and correct.

5 I am a detective with the Bruda County Sherriff's office. I am assigned to the traffic
6 investigation unit. I investigate everything from basic traffic offenses, to driving while intoxicated
7 offenses and accidents that lead to injury or death. I'm trained in roadside investigations including
8 accident reconstruction. I am familiar with the layout of the town and locations depicted in **Exhibit 4**.

9 For this case, late October 2021, I received a call from the homicide detective who had been
10 called out on a deceased person call at the park. He was advised by the medical examiner that the death
11 was caused by a motor vehicle accident.

12 I went to the park where the victim's body had been found. I took the picture in Exhibit 6, which
13 shows the general area of the park where the body was located. He was back under the tree line. He was
14 identified by his license which was found near his body. His name was Jefferson Doyle. He had a local
15 address. I'm not a medical expert, but have investigated many fatal vehicle accidents. Mr. Doyle had a
16 contusion or large bruised, cut on the top of his head right above his forehead. He had bruises on this
17 arms, body and legs. His left leg had a large, deep gash at the knee joint. There really wasn't anything at
18 the scene. No tire marks or blood evidence. To me and really everyone involved it was clear that the
19 location where the body was found was not the actual accident location.

20 I located his family. His son stated that Mr. Doyle has been homeless for some time – living in a
21 tent under the highways in town. He hadn't spoken with his dad in at least a year. I had no further



1 investigative leads. I maintained the file of all evidence in my desk drawer. It would be four months
2 before anything else happened on the case.

3 On February 26th, early in the morning, we got an anonymous call through the police tip line that
4 the person who killed Jefferson Doyle was the defendant, Arlo Key, and that the car involved in the
5 accident was still parked in Arlo’s garage at their house. We went to Arlo’s house to just see if anyone
6 was home. The house is actually on the same road as the park where Mr. Doyle’s body had been found.
7 Arlo answered the door and broke down crying as soon as they saw us. Arlo showed us to the garage
8 where the car was – it was clear that the car had been involved in an accident. The front windshield was
9 smashed in and there was blood in the vehicle. Arlo agreed to come down to the police station for an
10 interview. Arlo sat in the back left seat of my vehicle to get to the station. I don’t have any bars
11 separating the front and back seats. Another officer also sat in the back. It took approximately 25
12 minutes to get to the station – as there was a bit of traffic.

13 We took Arlo to an interview room. I read them the basic Miranda warnings before asking
14 questions. Arlo stated they understood their rights and that they wished to speak to the police regarding
15 what they know. I let them just tell their story once through. I asked basic questions, like “and what
16 happened next.” After that, I pulled up a statement form and went over their rights again. Then I helped
17 them type up a written version of their story. Along the way I made sure that what I was typing was
18 Arlo’s own words with statements like “does that look correct on the screen.” I didn’t suggest any of the
19 words. I printed the form and Arlo signed both of the signature lines (**Exhibit 1**).

20 After finishing up with the statement, Arlo sat in my office with another officer while I worked
21 on a search warrant for the residence and an arrest warrant for Arlo. Both were signed by a Judge and I
22 had another officer escort Arlo Key to the county jail facility to be booked in for the charge of Murder.

23 I and several other officers went to the residence at 511 Park Road, Bruda County, to execute the



1 search warrant. We had secured the keys during the earlier interview with Arlo. I went to the garage and
2 opened the garage door.

3 Again, I saw the vehicle had extensive damage. The hood was dented in. The windshield was
4 almost gone at this point. The roof was damaged right above the passenger seat area. The two front seats
5 had been removed. There was damage throughout the car. I verified the license plate matched to the
6 vehicle and was registered to Arlo Key. I saw some stains in the passenger side floorboard that appeared
7 to be blood. There was a hammer located on the back trunk of the vehicle. We collected the hammer as
8 evidence. We followed normal procedures for capturing evidence and then had the car towed to the
9 police impound indoor facility for storage.

10 I found the two front car seats in the backyard of the residence. All the fabric was burned from
11 the seats. All that remained was the metal structure of the seats. Inside the residence, on the kitchen
12 counter, I found a receipt from a bar which showed alcohol purchases made on Oct 25, 2021 (**Exhibit**
13 **2**).

14 On February 27th, 2022, Avery Beasley came into the police station for an interview. Avery's
15 story matched that of Arlo's written statement.

16 During my investigation I also spoke to Arlo's brother, Wilbert Key. Wilbert told us that he was
17 at the firehouse at 111 Firehouse Road on duty as a firefighter on the night of October 25th into the
18 morning of October 26th. All firefighters in Bruda County are also trained Emergency Medical
19 Technicians, and thus, – trained to administer trauma level first aid, stabilize patients, and transport them
20 in ambulances to hospitals.

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TEXAS YOUTH AND GOVERNMENT

AFFIDAVIT OF AVERY BEASLEY

STATE OF TEXAS
COUNTY OF BRUDA

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1 My name is Avery Beasley. I am over the age of 18 years and I am otherwise fully competent to
2 testify. I can read, write and understand the English language. I am not under the influence of any drug
3 or other substance which would prevent me from fully understanding the nature of this affidavit. All of
4 the information in this affidavit is within my personal knowledge and is true and correct.

5 I've lived in Bruda County my whole life. I know the town like the back of my hand (**Exhibit 4**).
6 I work in nursing as a certified nurses aid since 2012. I took a two-week course on the basics of the job.
7 Then there is a state level test that I passed. I have to do yearly in-service training. A nurses aid helps
8 elderly patients with daily lifestyle needs, such as, – changing bedding, dressing, feeding. Sometimes I'll
9 take a patient's temperature and heart rate. I don't handle any medication. If something comes up, I'll get
10 the head nurse.

11 I've known Arlo Key for several years. We both work as nurses aides at the same company. As
12 long as I've known Arlo, they have lived on Park Road (**Exhibit 5**). I actually stayed with Arlo for a
13 couple months when I was in between apartments. I live at the Brushings Lane Apartments. We all are in
14 a bigger friend group that would all meet up for drinks after work some nights. Arlo was on-again, off-
15 again dating Atlas Gibson. Atlas would go out with us as well.

16 On October 25th, 2021, we were all planning on going out to the Platinum Bar and Joint – PB&J
17 for short. I think we were celebrating a birthday for Atlas' cousin. PB&J is a basic night club – with
18 dancing and drinks, just a place to hang out. On Monday nights they have a drink special – its dollar
19 mixed drinks. They are like tiny plastic cups with barely any alcohol in them. It is located one city over
20 from where we live. From either my apartment or Arlo's house it would take about 30 minutes to get to
21 PB&J. From my apartment you head west – or away from the river – on Highway 942 to get to PB&J.



TEXAS YOUTH AND GOVERNMENT

1 Both Arlo and I worked on October 25th. My shift was from 7AM to 3PM. Arlo worked 2PM to
2 10PM. Before we left for PB&J, Arlo stopped by their house to change and then came to my apartment
3 to pick me up. They got to my house somewhere around 10:45PM. We both had one mixed alcoholic
4 drink at my place, and we split an Ether pill. I had taken Ether before, but Arlo never had. Ether is a
5 basic synthetic street drug. It's a stimulant and hallucinogenic that increases energy but distorts sensory
6 perception and time perception. It takes 30 minutes to kick-in but can last for up to 6 hours.

7 Arlo drove us to PB&J. We got there around about ten minutes before midnight. Atlas and their
8 cousin had brought a lot of people. We didn't really know all of them. We all had several drinks and
9 Arlo and Atlas shared a marijuana joint. Arlo seemed a bit more loose compared to normal – really “off.”
10 At one point, Arlo stumbled over a group of chairs on their way to the bathroom. Arlo wasn't injured at
11 all. PB&J closed at 2AM. We all hung out in the parking lot for a while and then started leaving.

12 Arlo got into the driver's seat of their vehicle and started driving away without me. The car
13 lurched forward, almost hitting the side of the building of the club. Arlo opened the door and fell out
14 onto the ground – laying on the ground. I helped them up and told them I would drive us home. We got
15 to my apartment around 2:45AM. Arlo's said their phone was dead. They made a quick call from my cell
16 phone and then headed home. I don't know who they called. I watched Arlo drive out of the apartment
17 complex – they didn't hit anything on their way out. I went in and went to bed.

18 Around 3:30AM, I heard my phone ringing – it was Arlo. They wanted me to pick them up from
19 their house. Arlo was whispering into the phone – like there was someone else near them that they didn't
20 want to hear the conversation. I drug myself out of bed and jumped in my car to get them. When I got to
21 their house, I called Arlo from my cell phone. Arlo came running out of the house from the front door. I
22 didn't see their car out front, so I assumed it was parked in the garage. That's normal though. Arlo was
23 frantic and was screaming, “drive, drive.” I've never seen them in an extreme state like that before. I
24 didn't know where we were going, I just drove away. Arlo borrowed my phone to try to call Atlas. I still



1 didn't know what had happened or what was going on.

2 I drove to Atlas' apartment, but they weren't there or didn't answer the door. Arlo then called
3 Atlas' sister, but she didn't answer. Arlo finally said something like, "I didn't mean to do it." Finally, I
4 got some of the story out – I didn't fully believe it. Arlo said they hit a skinny, older white man on the
5 road, stopped and tried to pull them off the hood and windshield of the car but couldn't. Arlos said the
6 man was still stuck in the windshield of the car that was parked in the garage. I asked if he was dead.
7 Arlo said, "He was making moaning noises, so I don't think so."

8 We were driving around trying to find Atlas for about 45 minutes before we made it back to the
9 house. Arlo went to the back of the house to try to find another number for someone who might know
10 where Atlas was. I went to the garage. I didn't really go that far in. It was dark. I turned on the light
11 switch which was on the wall right by the door. I saw the glass – scattered everywhere. And then I saw
12 him. His legs were on the hood of the car – facing down toward the car. His rear end was on the dash and
13 the rest of him was in the car. I listened for a minute but didn't hear anything. He didn't move at all. I
14 kinda of just knew he was gone already. I don't think anyone could have survived that kind of a crash.

15 I shut the door and ran back into the living room. I called out to Arlo. I wasn't going to be a part
16 of this. I told Arlo to call 911 and tell them what happened. I kind of got emotional at that point – like I
17 didn't fully believe it earlier. I became real when I saw the body. Arlo and me exchanged words because
18 they refused to call 911. I gave up and left. Arlo jumped in the car with me.

19 At my apartment, Arlo explained that it was dark, and the man just appeared in the road, "I didn't
20 mean to hit him." Arlo said the accident happened on the off ramp of Highway 942. It is dark right there
21 – not many streetlights at all. Then they stopped the car on Roderick way in between the two Highways
22 to try to get him off the car. Arlo said that after parking the car, they turned back to the guy and
23 apologized to him. Arlo said the guy never made any sounds while in the garage. Based on my
24 interaction with Arlo that night, I really think they weren't in their right mind. The drugs and alcohol just



1 messed with their ability to think straight.

2 I went back to bed. Arlo laid down on my living room couch.

3 The next morning, I left to go run some errands. When I came back to my apartment, Arlo was
4 there with Atlas and the cousin from the night before. They were all talking about what they were going
5 to do next. I told them I think they should just burn everything and be done with it. Atlas wanted to find
6 a way to give the body back to his family. Arlo asked to borrow my car – I was shook. I told them,
7 “Uhm, no. I’m not involved in this.” I drove them all to someone else’s apartment across town and
8 dropped them off. They all came back to my apartment really late that night. Arlo said they put the body
9 in the Mercy Meadows Park which was close to Arlo’s house.

10 Everyone left except for Arlo. Arlo told me not to ever saying anything to anyone – not in a
11 threatening way, just out of concern.

12 The next Monday, I was meeting a new acquaintance for a date at PB&J. I didn’t want to go
13 alone so I brought Arlo with me.

14 A couple months went by and nothing happened. Arlo didn’t drive that car obviously. I went over
15 to their house once and went into the garage. The windshield was smashed up a more than when I saw it
16 that night. The garage smelled pretty bad. There were blood stains on the carpet of the car. Late
17 February, I got a call from a friend telling me that Arlo had been arrested. At first, I thought Arlo turned
18 himself in due to guilty. But my friend say someone gave an anonymous tip to the police.

19 I knew eventually I would be pulled into all of this because I had been with Arlo before and after
20 it happened. Eventually, I gave a statement to some prosecutors and then to the Grand Jury. I lied in both
21 of those statements, because I didn’t want Atlas to get in trouble for moving the body. I was trying to
22 keep it from getting worse. I should have told the truth.

23 In exchange for my testimony today, the prosecutor has granted me immunity for any felony
24 perjury charges that they could have filed against me.



TEXAS YOUTH AND GOVERNMENT

AFFIDAVIT OF NOBLE WILKINS

STATE OF TEXAS
COUNTY OF BRUDA

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1 My name is Noble Wilkins. I am over the age of 18 years, and I am otherwise fully competent to
2 testify. I can read, write, and understand the English language. I am not under the influence of any drug
3 or other substance which would prevent me from fully understanding the nature of this affidavit. All of
4 the information in this affidavit is within my personal knowledge and is true and correct.

5 I am the lab director and owner of Forensic Consultants which is located here in Bruda County. I
6 started the company since 1976. We do most the things other crime labs do except for DNA analysis.
7 WE examine physical evidence and work crime scenes. I have a BS in Chemistry with minors in math
8 and physics from the University of Texas, and a Masters of Science in Physics from the same university.
9 Some other academic work toward a PhD in chemistry from Smith College in Massachusetts. I didn't
10 complete my PhD. I've worked in forensic chemistry for 33 years. During that time, I've attended a
11 number of seminars and trainings dealing with all aspects of forensic science, including blood spatter
12 analysis, hair ethnicity identification and material hardness tests. In the early 70s there wasn't a lot of
13 clear training on blood spatter analysis. Today there are several full training schools on blood spatter
14 analysis. I took a 4-day course at University of Georgia. I've also taught the subject at an undergraduate
15 professor at Bruda Community College.

16 I have testified as a blood spatter analysis in hundreds of state and federal murder trials both as a
17 prosecution and defense expert witness. I'm paid \$175 per hour for my services. I have spent 15 hours so
18 far in preparing my testimony and anticipate another 2 hours while testifying.

19 The analysis of blood spatter is based on basic physics. It's the study of how the liquid form of
20 blood is presented on a surface. A blood spatter analyst starts with an end state of blood located in a
21 specific location in a specific pattern. Blood does not vary significantly from person to person in terms of
22 its physical characteristics. Blood remains as a liquid mass unless acted on by forces. If those forces are



1 equal to the weight of gravity it will cause the formation of drops of about .05 ml volume. Meaning if we
2 take blood in a pippett in a controlled environment – so no side winds present – and we release the blood
3 from the pippett straight down, 90 degrees, onto a non-porous surface, the blood will hit the surface in
4 one location and then radiate out from the center into droplets of containing .05 ml volume of blood. If
5 greater forces are exerted on the blood the resultant drops will be smaller than 0.05 ml.

6 Where blood spatter analysts are most helpful is in determining the direction of travel of blood
7 drops. The definition of the direction of travel can be arrived at by looking at the length to width ratio of
8 the blood drop. Gravity pulls blood down to the surface of the earth. Just like a rain drop, the blood drop
9 will trail off in the direction it was traveling from – the tail will point backwards. So if blood is in flight
10 or moving through the air – it will act as all objects in flight do. It will be pulled downward by gravity.

11 “Cast off” is where blood is leaving an object that is in motion. For instances, if I had blood on
12 my hand then fling my hand quickly in one direction with a wall nearby, the wall will show a pattern of
13 blood drops in the direction along the path my hand was moving. As the blood drops left my hand they
14 would be deposited in a line across the wall’s surface.

15 Also, the angle at which the liquid hit the surface is also able to be determined. The lower the
16 angle the drop hits a surface the longer the pattern will be. A direct 90 degree hit will leave no trail.

17 There’s also surface contact stains. A transfer pattern will leave an imprint of the surface that
18 blood is leaving from. For instances a bloody shoe could leave a shoe print on the surface that it comes
19 into contact with. The blood prints will be heavier or more pronounced in the direction the shoe is
20 traveling from and more faint in the direction that the shoe is traveling toward.

21 I was contacted by Detective Fletcher Cruz to look at some physical evidence in connection with
22 this case. In March 2022, I went to the Bruda County Auto Impound to collect evidence and take
23 photographs of a vehicle. First off, I did a general visual examination of the vehicle (**EXHIBIT 9**).

24 The roof on the front section of the car had a large indentation above the passenger side area.



TEXAS YOUTH AND GOVERNMENT

1 There were several hairs and spattered blood found in the area of the roof where the indentation was
2 made right above the windshield area. **Exhibit 7** depicts this area, although that picture was taken by
3 Detective Cruz from the garage where the car was recovered from. The windshield had been smashed
4 into the vehicle.

5 At the impound, I observed blood throughout the passenger side interior of the vehicle.
6 **(EXHIBIT 8)**. Specifically, there was blood in the floorboard, in the door pocket of the passenger side
7 door and on the area of the passenger seatbelt buckle return and the center console.

8 There are several significant stains on the center console on the side facing the passenger seat of
9 the vehicle **(EXHIBIT 10)**. There were some hairs on the console and some hair prints in the dried blood
10 – right at the point where the seatbelt receiver would touch the center console. I collected the hair. Closer
11 to the front of the vehicle, the center console has a vertical stain that is indicative of a drip or stream of
12 active bleeding coming from above, dripping down between the console and the passenger seat.

13 If you open the arm rest up, there is a storage compartment. It was closed when I first viewed the
14 car. However, upon opening the arm rest, there are very fine, small blood drops - almost like a mist – on
15 the area closest to the driver's side in that storage area under the arm rest., These drops are consistent
16 with expired blood, which is – blood that has been forcefully expelled from someone's lungs or mouth
17 after a cough or forceful wheeze. To get blood into that console, the person's head would have to be
18 above the console and on the passenger side area, – facing the driver and in a downward slant. This same
19 storage compartment had several small glass fragments. When analyzed the glass was consistent with
20 windshield glass. The presence of blood and glass indicate the arm rest compartment was open during
21 the incident.

22 Also, the seatbelt receiver had blood stains on it and also hair was present on the receiver. I have
23 sufficient training on determining ethnicity based on hair samples. I determined the hair to be consistent
24 with a Caucasian person. It was blonde in color. It was not determined where the hair was located on the



1 body before it was transferred to the location in the car.

2 The head could not have been in the same position to deposit expired blood into the enter
3 console and also make the hair and blood transfer further down on the seatbelt receiver. We can deduce
4 two different points in time based on this evidence – or at least one movement of the head from one of
5 these locations to another.

6 I also examined the passenger side, inside door. The front pocket of the door had a large amount
7 of pooled, dried blood. Inside the pocket, there is a stain consistent of active bleeding, dripping down the
8 wall of the pocket. There was no evidence that blood outside the pocket dripped into the pocket. The
9 blood in the pocket was not cast off blood. The large volume in the pocket is indicative of an active
10 bleed taking place inside that pocket. Also, there is a contact, transfer stain on the outside of the pocket.
11 That stain had the pattern of a person’s left hand: – four fingers and then a thumb. I was able to theorize
12 that a hand contacted the outside of the pocket and at some point was placed inside the pocket where
13 blood from that hand actively bleed into the pocket. Again, we can theorize two different points in time:
14 – one caused by the initial transfer stain without evidence of significant active bleeding, and one that
15 caused stains in the pocket with active bleeding. It is my opinion that the hand came to rest inside the
16 pocket and remained there until the body was removed from the vehicle.

17 The passenger side door also had scattered drops along it indicating blood in flight, which were
18 located between two pockets in the door. The small blood droplets had a larger mass heading toward the
19 back of the car and a tail toward the front of the car. In total there were 13 or so small drops that were all
20 following the same trajectory and had the same volume of blood. I drew the opinion that these would
21 have been deposited during the initial moment of the body traveling through the windshield and into the
22 vehicle. The blood was not expired blood. The drops were larger than expired blood.

23 The dashboard had been wiped down. There was no glass or blood evidence gathered from the
24 dashboard.



1 There was no evidence that I could get from the front seats. They had been completely burned.
2 The seats would have had evidence that I could have drawn opinions from due to the location of the
3 body on or above the passenger seat.

4 I conducted no DNA analysis. I didn't confirmat any of the blood samples matched the victim in
5 this case.

6 There was a hammer collected by police. They also collected some of the broken windshield
7 glass. There are markings in the hammer head and in the fiberglass handled that were consistent with
8 this hammer being used to break windshield glass. I collected samples of both the front and back
9 windshield. A front windshield is a laminate – two sheets of glass with a plastic sheet in the middle. The
10 back windshield is not a laminate – it is just a sheet of glass. The front windshield is built as a laminate
11 to slow down an object or a person from traveling through the window. A person can make it through,
12 but there is an increased resistance from the plastic sheet.

13 I made visual observations of the hammer: with my own eyes and also under a microscope. If you
14 hit glass with a hammer, the glass will break but not the hammer. However, glass is harder than steal – in
15 that it more strongly resists scratching to its surface. You can scratch steal with glass, but you can't
16 scratch glass with steal. The hammer was made of steal. There were specific gouges in the hammer. I put
17 the glass on a hard table and truck the glass with the hammer. I was able to replicate the damage to the
18 hammer. Confirming this hammer was used to break out parts of the window. I then scratched the handle
19 with the glass provided in an attempt to replicate the gouges on the handle and was able to replicate the
20 same gouge marks. I couldn't tell you that the gouges were made from the hammer striking the specific
21 vehicle that I was tasked with examining for this trial.

22

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TEXAS YOUTH AND GOVERNMENT

AFFIDAVIT OF QUINN DAVENPORT

STATE OF TEXAS
COUNTY OF BRUDA

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1 My name is Quinn Davenport. I am over the age of 18 years and I am otherwise fully competent
2 to testify. I can read, write and understand the English language. I am not under the influence of any drug
3 or other substance which would prevent me from fully understanding the nature of this affidavit. All of
4 the information in this affidavit is within my personal knowledge and is true and correct.

5 I am the lead medical examiner for Bruda County. I received my Bachelor of Science, Master of
6 Science and medical degree all in pathology from University of Texas. My residency out of college was
7 a four-year stint at Bruda County Hospital in the late 70s. I am Board Certified through University of
8 Texas in clinical pathology. I'm an Associate Professor of Pathology at University of Texas. I've
9 published several papers and presented oral presentations at state conferences on various topics including
10 vehicular accident trauma and sudden infant death syndrome. I've consulted with the United National on
11 projects around the world including the Bosnian and Rawandan genocide events in the early 90s. My
12 team was called in to lead the investigation after the deaths in the Branch Davidian compound fire which
13 was also in the early 90s. I am qualified as an expert in trial courts in Texas and in Federal and
14 International Tribunals. My job includes testifying at trial so I'm not paid by any party in this case for
15 my testimony.

16 As the chief medical examiner, I have administrative responsibilities. We have a drug lab and a
17 crime lab. But I also perform case work – including individual autopsies. Pathology is a subset of
18 medicine that involves doing studies on tissues in labs to determine diseases in the body. A pathologist
19 supervisor a laboratory in a hospital. Pathologist also can perform autopsies to determine cause of death.
20 The medical examiner has the job of conducting a inquest were a person dies suddenly or with
21 unexplained causes of death. I've personally performed over 3,000 autopsies in my career.



1 For a case, I get information from the police and also a report from my own investigator who
2 could go out to the scene. In October 2021, I personally performed an autopsy of Jefferson Doyle. He
3 was brought to my office on October 26, 2021. I performed the autopsy the next day. We sent an
4 investigator to the park to see if there was any information that would help with the autopsy.

5 It was clear, how the body was found in the park was not consistent with the injuries and
6 conditions of the body. For example, the lividity present on the body suggested the body had been
7 moved to the park. Lividity is postmortem pooling of blood. After death, because there is no blood
8 circulation, the blood pools in the area of the body that is closest to the earth – pulled down due to
9 gravity. Lividity manifests in the skin changing color to a dark purple – it would almost look like a
10 bruise. Lividity can begin setting in within 30 minutes after blood circulation ceases and will become
11 fixed within 4 hours. The presence of lividity can tell us the position of the body when death occurred.

12 For this case, at the park, the body was found on his back on the ground. However, the
13 prominence of lividity was presented on the front of his body – specifically his face and the front of his
14 neck and chest. There was no lividity present on his back or on his lower torso or legs, indicated that for
15 at least the first four hours after death, the body remained in a face down position with his torso and legs
16 elevated above his upper body.

17 We can go through the injuries that I found on the body during the autopsy. We'll start at the top
18 and then work down.

19 Starting with the head, I saw a gliding abrasion on the right forehead. This implies that the body
20 came into contact with a hard surface at that location. The skin was scratched. There was not much
21 bleeding from this injury. This was not a serious injury. This injury alone would not have caused serious
22 injury or death. Although, this injury likely caused Mr. Doyle to immediately yet temporarily lose
23 consciousness due to the impact. I can't tell for sure the exact length of this temporary lack of
24 consciousness. It is likely to have been at least 30 minutes and could have been up to the point of his



1 death. There were no fractures of the skull or bleeding in the brain.

2 Next, for the torso, there were no internal injuries, and also, no organ damage such as to the heart
3 of lungs. No broken ribs. No internal bleeding. There were a parallel, deep abrasions from the lower
4 chest on the right side downward to the upper right thing. This is consistent with a dicing injury caused
5 by contact with shards of glass. The abrasions were confined to the skin and did not affect any vascular
6 structure. They would not have created any major bleeding. There were small fragments or shards of
7 glass found within the wounds. These were caused by impact with open glass. The injuries were
8 consistent with the body being moved through the windshield of the car and being logged in the vehicle.

9 For the arms, there were compound fractures of the right humerus along the distal or inside
10 portion of the right arm just proximal to the elbow joint. This was immediately under the back of the
11 elbow area on the right arm. The left hand had a localized abrasion or bleeding injury on the right thumb
12 extending down to the wrist joint. These were all not life-threatening injuries if basic first aid was
13 administered to stop bleeding. Left untreated, the injury to the left hand would have caused a lot of blood
14 loss.

15 The main injuries were found on Mr. Doyle's legs. Both legs had a simple fracture of the femur –
16 a broken bone – with overlaying areas of abrasion and soft tissue hemorrhage. These injuries were
17 localized approximately 6 inches above the knees. These injuries were immediately life threatening,
18 mainly due to issues with blood loss from open wounds. If Mr. Jefferson were treated in a hospital
19 setting within 20 to 30 minutes of the incident, he would have assuredly survived the injuries. Medical
20 treatment beyond the 30 minute time frame would still have been advised. However, the chance of
21 survival after 30 minutes would decrease significantly as time progressed. Based on my experience, the
22 blood loss due to arterial injuries from these types of wounds would have caused death within a few
23 hours, with the outside range being a maximum of 4 hours. These breaks would likely have resulted from
24 the initial impact with the vehicle. The severity also indicates this break was the location of the first



1 contact between the body and the vehicle. The location of the separated femur post-mortem indicate that
2 Mr. Doyle was facing the vehicle upon impact.

3 In total, the injuries paint a clear picture. While facing the vehicle, Mr. Doyle's legs were
4 impacted by the front of the car, directly above his knees. This would have caused his torso to move
5 forward in relation to his lower body. As the car moved forward, Mr. Doyle's head impacted the
6 vehicle's windshield causing the injury to his forehead and immediate loss of consciousness. He moved
7 through the windshield causing the dicing injuries to his torso and the injury to his left hand.

8 In my professional opinion, the blood loss would have been the primary means of death. The
9 most significant bleeding coming from the area of his broken legs, with a less serious source of bleeding
10 from his left hand. There is a strong possibility that Mr. Doyle never regained consciousness after the
11 impact even though death was prolonged.

12 As a Medical Doctor, I am familiar with the effect of drugs and alcohol on an individual's
13 decision-making ability. I have read several studies on the effects of intoxication where the researcher
14 provided subjects with a measured dose of certain substances and monitored their ability to perform
15 tests. Comparing the individual's performance before and after intoxications allows the researcher to
16 arrive at an overall effect level.

17 I reviewed the case file from the police and learned that within a few hours of the incident, Arlo
18 had consumed marijuana, alcohol, and an ether pill. Ether causes time distortions. An individual
19 experiencing Ether would have trouble understanding the passage of time. A positive experience could
20 feel like it is lasting for an extended period of time – minutes stretched into what feels like hours. A
21 negative experience could feel compressed – hours could feel like they pass in minutes. Moderate
22 alcohol consumption, that is more than one drink per one hour time frame, could cause individual to
23 have trouble walking. Alcohol could also cause slurred speech, blurry vision, impaired reaction times,
24 trouble arriving at decisions, and reduced inhibitions.



TEXAS YOUTH AND GOVERNMENT

1 Finally, I have extensively studied sleep deprivation, specifically work exhaustion and its effects
2 on a person's mental capacity. I have personally conducted experiments while at the University of Texas
3 on this topic. We would purposefully keep subjects awake for extended periods of time performing data
4 entry tasks requiring mental stamina and also physical tasks such as restocking a supply room. We would
5 measure the subject's ability to correctly perform function over the course of time.

6 I am aware in this case; the defendant had recently completed a long shift at work before going
7 out for the night. It is my professional opinion that this level of exhaustion would induce a decreased
8 ability to focus and solve problems, would decrease alertness and response times.

9 When you mix intoxicants and have a person experiencing exhaustion, this combination to the
10 person's mental and physical capacities has exponential effects. It is my opinion, that these factors
11 caused the defendant to not be in a normal state of mind when the Defendant faced the circumstances of
12 how to react immediately after the incident.

13 Pushing or pulling a body through the windshield would have aggravated the injuries to some
14 extent. If that was done by trained Emergency Medical Technicians, additional injuries would likely be
15 minimal. It is hard to speculate, by continuing to drive with a body lodged in the windshield could have
16 caused more damages. The forces of acceleration and deceleration could have shifted the body causing
17 additional injuries.

18 However, in this case, without question, it was the lack of medical care that led to Mr. Doyle's
19 death.

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TEXAS YOUTH AND GOVERNMENT

AFFIDAVIT OF ATLAS GIBSON

STATE OF TEXAS
COUNTY OF BRUDA

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1 My name is Atlas Gibson. I am over the age of 18 years, and I am otherwise fully competent to
2 testify. I can read, write and understand the English language. I am not under the influence of any drug
3 or other substance which would prevent me from fully understanding the nature of this affidavit. All of
4 the information in this affidavit is within my personal knowledge and is true and correct.

5 I'm a friend or at least was a friend of Arlo Key. We dated on and off over the years. It was
6 nothing real serious. I live in Bruda County at the same apartments as Avery. Although, I don't really
7 know Avery that well. I'm currently incarcerated, serving a 10 year sentence for my involvement in this
8 case. I didn't get any plea deal. I'm not being paid at all for my testimony. It is a break from being in
9 prison, but honestly, I'd rather be there than in this courtroom. I'm just here to tell the truth. Arlo doesn't
10 deserve to go to prison.

11 On October 25, 2021, a big group of us were going to PB&J Bar for my cousin Gary's birthday. I
12 told Arlo what our plans were. I got to the club about 11:00PM. Arlo got there about 12:30, or
13 somewhere after that. I don't really remember. Arlo showed up with Avery. As far as I remember, Arlo
14 came right over to our group. Arlo looked different from the way I normally see them. I asked what was
15 wrong. Arlo said they weren't feeling good, that they were high on something. Avery said they gave
16 Arlo an Ether pill. That made me mad. I had seen Arlo drink before but never take any dangerous pills.
17 Arlo gave gave me their keys and money to hold onto for the night.

18 I didn't see Arlo drink at all that night, although I wasn't around them all night. Arlo and I did
19 share some marijuana. I left the club about 10 minutes to 1AM. I handed off Arlo's money and keys to
20 my cousin to give to Arlo. I went home with someone else.

21 The next morning, I had like 20 messages on my cell phone from Arlo. I had turned my phone off



1 the night before. I don't remember if I returned the calls or if I answered another call from Arlo. Arlo
2 said they needed to talk and that it was important. I told Arlo to meet me at my grandmother's house in
3 town. Arlo pulled up in a car and I just asked, "what is it." As soon as I got in the car I knew something
4 was wrong. We drove off and by the time we got a few blocks away Arlo started crying and said they
5 messed up real bad. Arlo said something like, "you're going to be bad at me." We went back to Arlo's
6 house. Still crying and hollering. I called a friend of mine just so someone would know where I was. I
7 was nervous about the whole situation so I wanted someone to know where I was and who I was with.

8 Once we got to the house and went inside, I looked around and still didn't know what was up.
9 Arlo hesitated some more and then started telling me about a wreck. I asked, "Did the police already let
10 you come home." I thought they had already been arrested and released. Arlo said they messed up their
11 car real bad. We started walking to the garage. I tried to open the outside garage door and Arlo stopped
12 the door from going up. I turned the garage light on, which didn't provide much light. I saw the
13 windshield was busted and the top of the car was dented. Arlo still would explain, just crying a lot. I told
14 Arlo we can always get the car fixed.

15 I started opening up the driver's side door and as I did Arlo screamed out, "I hit someone, and he
16 is still in the car." I saw the body. Just about all of him was upside down, crammed into the passenger
17 floorboard and seat. Arlo said, "I think he is dead." I used some colorful language to ask why Arlo pulled
18 me into this mess. I just got out of prison for a drug charge, and I promised my kids I wasn't going back
19 to prison. I knew Arlo just caused me to pick up a new charge. I got upset immediately at Avery because
20 they gave Arlo the Ether pill. I knew immediately what caused this.

21 I poked at the man with some garden tool like a rake. He didn't move at all. He was for sure
22 dead. I walked back into the living room. I told Arlo it was alright, that it was an accident, and it would
23 be alright. No one was shot or stabbed intentionally. You don't get in trouble for a car wreck because
24 you don't mean anything by it.



TEXAS YOUTH AND GOVERNMENT

1 Arlo was still sobbing. Arlo said they didn't remember much. Arlo was exiting to get home and
2 was surprised when the guy came through the windshield. Arlo pulled over and tried to pull him out
3 through the front windshield. Arlo climbed up and tried to elbow the windshield out more to get him out.
4 He wouldn't budge so Arlo just drove him back to the house, into the garage.

5 Arlo said the man was still alive at that time because the man was still making some sounds. Arlo
6 said that Avery came over and they both hear him making a moaning noise.

7 We all went back to Arlo's friend's house and we all just sat in the living room. Avery started
8 suggesting that we burn the body and bury it somewhere. Arlo and I both said no. That's what you do if
9 you meant to kill someone. This is just an accident and his family deserved to have the body to have a
10 funeral. Avery wanted to burn the car as well. I think Avery was feeling guilty about the whole thing.

11 I had a friend named Nickey who let us borrow her car. We never told her what we were doing
12 with the car. Avery drove Arlo and I to Nickey's house to get the car. Avery went back home. Arlo and I
13 drove back to Arlo's house. My cousin Gary met us at the house.

14 We all went through the front door and then into the garage. Gary didn't believe me up to this
15 point. When he saw the body, then he appalled and shocked. I got a blanket or something out of a
16 hallway closet and laid it by the passenger side door. I opened up the car door. His weight was shifted
17 against the car door, so his body just tilted out of the door. I had to move his legs to get him fully in the
18 blanket. I pulled all four corners together and tied them together. I took a second and like apologized out
19 loud. During this whole time, Arlo had gone back inside the house. They were crying the whole time.

20 Gary and I loaded the body into the trunk of the car. We drove down to the park and left Arlo at
21 the house. We pulled up and took the body out of the car. Gary handed me a knife and I cut the blanket
22 off. We took the blanket and let him in the park. **Exhibit 6** shows the location. There was a dark sign that
23 had the name of the park. We left him right under the sign.

24 We went to the car wash. We washed the car and put the blanket in the trash. We picked up Arlo



TEXAS YOUTH AND GOVERNMENT

1 and went back to Avery's house so Avery could help us take the car back to Nickey.

2 I called almost every day to check on Arlo after that date. I never saw Arlo again though. I saw it
3 on the news that Arlo was arrested. I knew immediately that I was going to get into trouble for moving
4 the body.

5 Because of my actions in this case, I was charged with Tampering with Evidence. I pled guilty
6 and was given 10 years.



TEXAS YOUTH AND GOVERNMENT

AFFIDAVIT OF TAYLAN DOYLE

STATE OF TEXAS
COUNTY OF BRUDA

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1 My name is Taylan Doyle. I am over the age of 18 years, and I am otherwise fully competent to
2 testify. I can read, write and understand the English language. I am not under the influence of any drug
3 or other substance which would prevent me from fully understanding the nature of this affidavit. All of
4 the information in this affidavit is within my personal knowledge and is true and correct.

5 I am 20 years old. I live on campus at Southwestern University. I am studying church ministry.
6 Jefferson Doyle was my father. Growing up I lived on and off with my dad. My parents divorced when I
7 was very young. I grew up with my mom. I saw dad every other weekend at his house. He came to a few
8 athletic events. In 9th grade, I lived with my dad, just for that year before I moved home with mom.

9 My dad had his own business in masonry. He typically did small jobs like building retaining
10 walls or planter beds. He was always friendly although he didn't have many friends. He was hard
11 working and loving to those around him.

12 My dad was schizophrenic. He was on medicine as long back as I can remember. For most of his
13 life he had a home. He became homeless a few years back. He tried to help a new girlfriend with her
14 financial troubles. As a result, he couldn't make his truck payments which caused him to not be able to
15 work. The girlfriend went to jail and my dad was kicked out of the house they were both staying in. He
16 stayed at the shelter in town. I still tried to visit him.

17 It was early in 2020, probably late February, when I saw my dad for the last time. He wanted me
18 to join him at the homeless shelter and walk around town with him. I met him about 7:00 at night. It was
19 already dark, and I didn't really want to be out walking around in the dark. But this was my dad and I
20 wanted to spend time with him. We were close to the fire station and dad wanted to go to the park so
21 show me something. I forget now what it was. There isn't a great walking bridge in town to get from one
22 side of the river to the other. He said it was fine for us to walk along the shoulder of the highway bridge.



TEXAS YOUTH AND GOVERNMENT

1 I was super hesitant. We walked up the access ramp and a car flew by coming off the highway at like 50
2 miles per hour. It honked at us and swerved out of the way as we attempted to move out of its way. I'm
3 not a daredevil type of person – this was all too much. We made it across the bridge and down to the
4 park. I ended up calling an Uber from there to get home. I talked to Dad and told him that being near the
5 highways was unsafe. That meeting was really sad. It was clear that Dad was off his meds. He would
6 bring up random conspiracy theories about birds not being real, how they were replaced by the
7 government and are just spy drones. The only other time I'd seen him like that is when he forgot to refill
8 a prescription for a few days. I think he had just given up on trying to stay medicated.

9 I stopped hearing from Dad after COVID hit.

10 It was in October 2021, that I heard my dad had passed away. I was a senior in high school. I
11 planned and directed his funeral. We held the funeral October 31st. There are many missing pieces in my
12 life. Like on Father's Day, I didn't have a father to send a card. He was gone before my high school
13 graduation. He won't be here at my wedding. I won't be able to tell him about my future jobs.

14 I think there is too much hate in the world for me to do anything other than extend
15 forgiveness to Arlo. We all make mistakes and hopefully learn from them. My dad was
16 temporarily taken away from me by a horrible disease and then permanently by Arlo's actions. I
17 don't think anything else should be taken away. There's been so much loss already. My dad
18 didn't have a choice that morning when he was stuck in the windshield. But today I do have a
19 choice. I choose to forgive. Arlo had risky behavior, but so did my dad. Arlo shouldn't go to jail
20 because of my dad's choices.

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