

CASE BACKGROUND

The defendant, Rowan Hyde, has been charged with the murder of a neighbor, Lucky Lou Contralto. Lucky Lou had been a loan shark for the Tessitura mafia family, but turned government witness. At the time of his death, he had been under the protection of the United States Marshal's Office in the federal witness protection program under the assumed name of Lou King, living in Crown Point, Indiana.

Lucky Lou was, undoubtedly, the most obnoxious neighbor. Shortly after Lucky Lou relocated to Crown Point, he and the defendant had a heated confrontation regarding property damage. The feud escalated over time, and Lucky Lou harassed and threatened the defendant mercilessly. A source of Lou's complaints against the defendant was the defendant's Champion Chow Chow, Grendel. One night, Lucky Lou goes to the defendant's home to end Grendel's life. Lucky Lou was not seen alive again. That night, a neighbor saw the defendant dragging a rolled up rug the size of an adult person. However, a week before Lucky Lou went missing, suspicious characters were observed lurking in Lucky's quiet neighborhood. Perhaps the mob located Lucky Lou and had him whacked. Contralto's decomposing body was subsequently found several days later floating in a nearby lake, his throat slashed. Bloodstains are found inside the home of the defendant. Is the defendant, Rowan Hyde, guilty of murder?

The witnesses for each side of the case are as follows:

Prosecution Witnesses:

Garren Teed (U.S. Marshal)
Jerry Bilt (Police Detective)
Claire S. Day (Neighbor)

Defense Witnesses:

Rowan Hyde (Defendant)
Ricci Contralto (Son/daughter of Lou Contralto, decedent)
Dee Ennay (Forensics expert)

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STATE OF INDIANA)
) SS:
COUNTY OF LAKE)

IN THE LAKE SUPERIOR COURT
CRIMINAL DIVISION I

STATE OF INDIANA

v.

ROWAN HYDE

Cause No. 45D01-1116-CR-1619

Defendant.

INDICTMENT

The Grand Jury of the County of Lake upon their oath or affirmation do present that ROWAN HYDE on or about the 10th day of September, 2016 in Crown Point, Lake County, in the state of Indiana knowingly, intentionally, and deliberately, with premeditation and malice aforethought, and by means of slashing the throat of Lou Contralto, murdered him, in violation of Indiana Code 35-42-1-1.

I swear, under penalty of perjury, as specified by IC 35-44-2-1, that the foregoing representations are true.

/s/ Foreperson

APPLICABLE LAW

IC 35-41-2-2 Culpability

- (a) A person engages in conduct "intentionally" if, when he engages in the conduct, it is his conscious objective to do so.
- (b) A person engages in conduct "knowingly" if, when he engages in the conduct, he is aware of a high probability that he is doing so.

IC 35-41-4-1 Standard of proof

- (a) A person may be convicted of an offense only if his guilt is proved beyond a reasonable doubt.

IC 35-42-1-1 Murder

A person who:

- (1) knowingly or intentionally kills another human being commits murder, a felony.

IC 35-42-1-3 Voluntary manslaughter

- (a) A person who knowingly or intentionally kills another human being while acting under sudden heat commits voluntary manslaughter, a Level 2 felony. However, the offense is a Level 1 felony if it is committed by means of a deadly weapon.
- (b) The existence of sudden heat is a mitigating factor that reduces what otherwise would be murder under section 1(1) of this chapter to voluntary manslaughter.

“**Sudden heat**” is defined as sufficient provocation as to excite in the defendant’s mind anger, rage, resentment, or terror sufficient to obscure the reason of an ordinary person, preventing deliberation and premeditation, excluding malice, and rendering a person incapable of cool reflection. *Brown v. State*, 751 N.E.2d 664, 671 (Ind.2001)

IC 35-42-2-1 Battery

- (a) A person who knowingly or intentionally touches another person in a rude, insolent, or angry manner commits battery, a Class B misdemeanor.
- (b) The offense described in subsection (1)(a) is a Level 5 felony if one (1) or more of the following apply:
 - (1) The offense results in serious bodily injury to another person.
 - (2) The offense is committed by means of a deadly weapon.

IC 35-43-1-2 Criminal mischief

- (a) A person who:
 - (1) recklessly, knowingly, or intentionally damages or defaces property of another person without the other person's consent; or
 - (2) knowingly or intentionally causes another to suffer pecuniary loss by deception or by an expression of intention to injure another person or to damage the property or to impair the rights of another person;commits criminal mischief, a Class B misdemeanor.

IC 35-43-2-2 Criminal trespass

- (a) A person who:
 - (1) not having a contractual interest in the property, knowingly or intentionally enters the dwelling of another person without the person's consent; commits criminal trespass, a Class A misdemeanor.

IC 35-45-2-1 Intimidation

- (a) A person who communicates a threat to another person, with the intent:
 - (1) that the other person engage in conduct against the other person's will;
 - (2) that the other person be placed in fear of retaliation for a prior lawful act; commits intimidation, a Class A misdemeanor.
- (b) However, the offense is a:
 - (1) Level 6 felony if:
 - (A) the threat is to commit a forcible felony;
 - (2) Level 5 felony if:
 - (A) while committing it, the person draws or uses a deadly weapon.
- (c) "Threat" means an expression, by words or action, of an intention to:
 - (1) unlawfully injure the person threatened or another person, or damage property.

IC 35-50-2-3 Sentencing for Murder

- (a) A person who commits murder shall be imprisoned for a fixed term of between forty-five (45) and sixty-five (65) years, with the advisory sentence being fifty-five (55) years. In addition, the person may be fined not more than ten thousand dollars (\$10,000).
- (b) Notwithstanding subsection (a), a person who was:
 - (1) at least eighteen (18) years of age at the time the murder was committed may be sentenced to:
 - (A) death; or
 - (B) life imprisonment without parole.

IC 35-50-2-4 Sentencing for a Level 1 felony

A person who commits a Level 1 felony shall be imprisoned for a fixed term of between twenty (20) and forty (40) years, with the advisory sentence being thirty (30) years. In addition, the person may be fined not more than ten thousand dollars (\$10,000).

IC 35-50-2-5 Sentencing for a Level 2 felony

A person who commits a Level 2 felony shall be imprisoned for a fixed term of between ten (10) and thirty (30) years, with the advisory sentence being seventeen and one-half (17 ½) years. In addition, the person may be fined not more than ten thousand dollars (\$10,000).

IC 35-50-2-6 Sentencing for a Level 5 felony

A person who commits a Level 5 felony shall be imprisoned for a fixed term of between one (1) and six (6) years, with the advisory sentence being three (3) years. In addition, the person may be fined not more than ten thousand dollars (\$10,000).

IC 35-50-2-7 Sentencing for a Level 6 felony

A person who commits a Level 6 felony shall be imprisoned for a fixed term of between six (6) months and two and one-half (2 ½) years, with the advisory sentence being one (1) year. In addition, the person may be fined not more than ten thousand dollars (\$10,000).

IC 35-50-3-2 Sentencing for a Class A misdemeanor

A person who commits a Class A misdemeanor shall be imprisoned for a fixed term of not more than one (1) year; in addition, he may be fined not more than five thousand dollars (\$5,000).

IC 35-50-3-3 Sentencing for a Class B misdemeanor

A person who commits a Class B misdemeanor shall be imprisoned for a fixed term of not more than one hundred eighty (180) days; in addition, he may be fined not more than one thousand dollars (\$1,000).

IC 32-30-6-6 Nuisance

Whatever is:

- (1) injurious to health;
- (2) indecent;
- (3) offensive to the senses; or
- (4) an obstruction to the free use of property;

so as essentially to interfere with the comfortable enjoyment of life or property, is a nuisance, and the subject of an action.

IC 32-30-6-7 Nuisance actions; plaintiffs

- (a) An action to abate or enjoin a nuisance may be brought by any person whose:
 - (1) property is injuriously affected; or
 - (2) personal enjoyment is lessened;by the nuisance.

IC 32-30-6-8 Nuisance action; remedies

If a proper case is made, the nuisance may be enjoined or abated and damages recovered for the nuisance.

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STIPULATIONS

Note: No witness may contradict or deny knowledge of the facts contained in the stipulations.

1. All exhibits included in these Case Materials are authentic and accurate in all respects; no objection to the authenticity of these exhibits will be entertained. Unless stated otherwise herein, the admissibility of the exhibits on other grounds may be challenged.
2. All witness statements were signed by each witness under oath.
3. Exhibit 5 was made at or about the time of the events by a person with knowledge of the events, and is kept in the course of regularly conducted business activity, and it is the regular practice to make such records. Exhibit 5 does not need to be introduced through the custodian of the records.
4. The conclusions of the Toxicology and Serology reports referenced in the autopsy (Exhibit 5) are admissible.
5. The proper chain of custody for all blood and tissue samples from the time of collection and processing was maintained.
6. The Lake County Sheriff's Department Criminal Investigations unit tested for trace evidence and found none.

1 **Statement of Garren Teed**

2 My name is Garren Teed. I am a United States Marshal for the Witness Protection
3 Program in Brooklyn, New York. Lou Contralto was a witness in the Witness Protection
4 Program. He and his son/daughter, Ricci Contralto, were assigned to me for protection in 2008.

5 My interest in law enforcement began when I was about 14, growing up in Brooklyn. My
6 parents owned a little pizza shop there. They are hard-working, honest people. In the mid to late
7 '80s, it became headline news that the Mafia was using pizza joints to disguise meetings and
8 money laundering for the Mafia's heroin trafficking. In the "pizza connection" case, a former
9 chief of Sicily's Mafia and 16 other men were convicted in Manhattan of running an international
10 ring that distributed heroin, with a street value estimated at \$1.6 billion. My parents' business
11 suffered when the news broke on the Mafia's scheme, even though my parents had nothing to do
12 with it. At that time, there were other news headlines of significant mob trials. In the "mob
13 commission case," eight men, including mob bosses Anthony Salerno, Anthony Corallo and
14 Carmine Persico were convicted in Manhattan of being part of the Mafia's ruling commission.
15 During the late '80s, the Philip Rastelli case went to trial. Mr. Rastelli, the head of the Bonanno
16 family, and eight others were convicted of labor-racketeering. The law men were the heroes and
17 the streets were getting cleaned up. I decided then to make law enforcement my career.

18 Upon graduating from high school, I attended St. John's University in Queens. I
19 graduated in 1994 with a Bachelor's of Science degree, with honors, in Criminal Justice. While
20 working on my bachelor's degree, I was able to participate in the New York Police Department
21 Cadet Program, a special internship program available to St. John's students majoring in
22 Criminal Justice. In the late '80s and early '90s, the John Gotti trials were front and center. My
23 interest in fighting organized crime grew even stronger. Since graduating in 1994, I have served
24 in law enforcement. My internship led to a position with the NYPD, the nation's premier police
25 department. I was fortunate to be assigned to the Organized Crime Investigation Division of the
26 Organized Crime Control Bureau.

27 In 1998, I began my career as a United States Marshal. I have been a Marshal for 18
28 years, 11 of those years have been in the Witness Protection Program. The requirements to
29 become a U.S. Marshal include, among other things, a bachelor's degree with either superior
30 academic performance or one year in a graduate program. To qualify as a U.S. Marshal, you are
31 also required to complete a rigorous 21 ½ week training course. A U.S. Marshal assigned to
32 protect a witness requires special skills. You have to be able to deal with people under
33 tremendous stress, who may be belligerent, distrusting, and difficult. Despite a stressful
34 environment, decisions have to be made quickly. Yet it is the pressure, the problem solving, and
35 the finding of a solution that kept me going. I feel privileged to be able to serve the public and
36 work for the government in a capacity where we face complex problems that have very real life
37 and death consequences. Every day, I and all U.S. Marshals, put our lives on the line, protecting
38 witnesses, knowing that the first shots fired will be at us.

39 My first two years as a U.S. Marshal, I escorted prisoners between the jail and courts in
40 the District of Columbia. For the next five years, I was assigned to Fugitive Investigations at our
41 Philadelphia Office. I won praise for capturing a fugitive without firing a shot, even though the
42 suspect had barricaded himself inside an apartment and said he would never be taken alive. In

1 2005, I was assigned to Witness Security. The first five years in witness protection, I was
2 stationed in Chicago where I was assigned to hide and protect mobsters while they were waiting
3 to testify. I then continued with their protection and relocations for the safety and security of the
4 witnesses and their families after the trial. In 2010, my assignment brought me back home to
5 Brooklyn, where I felt I could provide even more service to the government for more high profile
6 cases with the goal of convicting mob bosses, which used to be untouchable.

7 My primary duties in Brooklyn consisted of witness security for “made men” (a mafia
8 term for fully initiated members of the Mafia family, who possess critical inside information as
9 business can be discussed openly in front of them). My secondary duties involve continuing
10 serving as the agent in charge, as necessary, for the safety and security of witnesses that were
11 previously assigned to me in Chicago. Once a Marshal is assigned to a witness and the family,
12 he/she oversees their case from the moment they are accepted into the program until the day the
13 witness leaves it. As my responsibilities increased in Brooklyn, I necessarily devoted more time
14 to the new cases assigned to me, and less and less time to the old Chicago cases. This is not
15 unusual, however, because the more years that pass from the time the witness testified the less
16 risk there is to him/her and the family. The risk is reduced for a variety of reasons, including a
17 successful relocation, inability of a hit man to locate the witness, or a lack of interest by the
18 Mafia to continue a hit on the witness, instead diverting energy and resources to other mob
19 priorities. The primary threats are in the first two years after the trial testimony. While it is the
20 exception to the rule, the Marshal’s Service has had threats to witnesses as much as ten years
21 after the trial testimony and relocation of the witness. The Marshal’s Service have thwarted
22 those attempted murders as we stay vigilant in protecting all witnesses, new and old, when we
23 have information of a potential risk.

24 The Federal Witness Protection Program, also known as the Witness Security Program or
25 WITSEC, is administered by the United States Department of Justice and operated by the United
26 States Marshals Service. The United States Marshals Service is the nation’s oldest and most
27 versatile federal law enforcement agency. Federal Marshals have served the country since 1789.
28 The Witness Protection Program began in the mid-1960s and formally was established in 1970
29 under Title V of the Organized Crime Act. The Justice Department needed witnesses to testify
30 in its battle against organized crime. A good eyewitness can almost always guarantee a
31 conviction. Fingerprints, murder weapons, forensic findings are all helpful, but none is as
32 convincing as a credible witness who takes the stand and swears under oath, “I was there and I
33 saw the defendant so it.” Protecting these eyewitnesses and informants through WITSEC is
34 regarded as an invaluable tool in the government’s war on crime.

35 Prior to the establishment of WITSEC, those who had agreed to testify against the Mafia
36 would be executed prior to trial. The Department of Justice would not be able to obtain a
37 conviction because the key witness, the informant, was murdered. The murders also sent a
38 message to any others thinking about testifying or informing against the Mafia. No one wanted
39 to break the much feared Mafia code of *omerta*. Crimes would go unpunished because people
40 were too scared to speak up. Others wanted to get out of the life of crime, but knew they would
41 be hunted down because they did not have the resources or know-how to avoid detection.
42 Without protection and new identities, these witnesses and informants would not come forward.

1 Even though the old-world mob has died down, organized crime still exists in America.
2 But members of criminal enterprises don't have strong allegiances to their leaders anymore,
3 making witness protection more important than ever. In addition, more criminal enterprises exist
4 today, meaning more witnesses that need protection.

5 WITSEC provides for the security, safety, and the health of persons whose lives are in
6 danger as a result of their cooperation with the government. It is designed to protect threatened
7 witnesses, and sometimes their immediate dependents, before, during, and after testifying for a
8 trial. Taking such drastic measures to protect witnesses has paid off for prosecutors. Since the
9 program's inception in 1970, it has achieved an overall conviction rate of 89 percent as a result of
10 protected witness testimony, and more than 10,000 criminals have been convicted.

11 WITSEC has the best protective service in the world, and a reputation for never losing
12 anyone. U.S. Marshals in WITSEC receive specialized, exclusive training. The WITSEC
13 Marshals understand that it is their responsibility, their duty, to serve and protect the witnesses
14 and their families. Any deputies who don't measure up are booted out. My assignment to
15 protect a witness is my job, whether the person is a scumbag or the President of the United
16 States. You don't take a bullet for the Mafioso, you take a bullet because you are a professional,
17 and that's your job. The best thing we could do for society is to help the witness start a
18 productive and honest life. We are actually the heroes that come in the night and save these
19 witnesses. We give them the opportunity to live.

20 WITSEC provides for the relocation and protection of the threatened witnesses. Since
21 its inception, WITSEC has protected over 8600 witnesses and 9900 family members of the
22 witness. About 95% of the witnesses in the program are criminals. Approximately 17% of the
23 protected witnesses that were criminals in their former life will be caught committing another
24 crime while under the protection of the government. However, the U.S. Marshals Service fully
25 cooperates with State and local law enforcement and court authorities to bring witnesses to
26 justice or to have the protected witness fulfill their legal responsibilities in any criminal or civil
27 legal matter.

28 The process for enrolling a witness into the program begins when a state or federal law
29 enforcement agency submits a request for protection. The application summarizes the testimony
30 to be provided, the threat to the witness and any risk the witness may pose to a new community if
31 relocated. A preliminary interview with the Marshals Service is arranged, so the witness can
32 find out what to expect from his or her new life in the program. The witness and family
33 members must sign a Memorandum of Understanding, verifying they understand the rules of the
34 program. A true and accurate copy of the Memorandum of Understanding that is issued to each
35 and every witness, is attached as Exhibit 1. Following the preliminary interview, the Marshals
36 Service makes its recommendation as to whether the prospective witness should be placed in the
37 Witness Security Program. The U.S. Attorney General has the final authority to enroll a witness
38 into the program. If the value of the witness' testimony outweighs the danger to the new
39 community, the Attorney General can authorize the witness to participate in the Witness Security
40 Program.

41 The witness and his family are immediately removed from their current location and
42 taken to a temporary, secure holding area. The U.S. Marshals Service then provides 24-hour

1 protection to protected witness both for pre-trial matters and during the trial because it is a high
2 threat environment. The 24-hour protection ends after the trial. Protection after the trial includes
3 providing new identities to the witness and immediate family members. There is a psychological
4 advantage to changing a name, in addition to providing added protection. It helps in the
5 transformation into a new person, starting over with a fresh start. Along with changing names,
6 WITSEC provides social security numbers, and authentic documentation for the new identities.
7 If a child is involved, we recreate school records too.

8 Protected witnesses are relocated, usually to a new community, often in a different state.
9 The US Marshal selects the location. The witness does not have any input in that decision. They
10 cannot choose to live in the Caribbean or in the French Riviera. If a witness selected the place for
11 relocation, the place selected might be a location they are familiar or have relatives and friends.
12 WITSEC cannot afford such niceties. The best thing I could do for them was to relocate them
13 some place far away from their home so that they didn't have to keep looking over their
14 shoulders. The Witness Security Program is designed to create total anonymity for witnesses
15 and help them blend into a new city where they most likely won't be recognized. Adjustment to
16 a new community has its hiccups too. They have to look like they fit in, even though the new
17 community may be worlds apart from their former life. Many protected witnesses have never
18 mowed grass in their life. Sometimes it is difficult for the protected witness and their family to
19 "blend in." A leopard cannot change his spots. The wise guy life is a sharp and cocky, cash-
20 driven subculture. With a new identity, we ask those we are protecting to try not to be who they
21 are. If the Marshal Service or the protected witness ever suspected he is in danger, all he needs
22 to do is call a special telephone number, and a squad of deputy U.S. Marshals would rush to his
23 aid and move him instantly.

24 Relocation involves providing moving expenses, housing, and medical care. Although
25 witnesses receive subsistence from the government for basic living expenses, it usually is
26 provided only for three months to two years, depending upon the circumstances. So, protected
27 witnesses also need to obtain employment. For some witnesses, finding a job is the biggest
28 headache. Some witnesses have never worked at a legitimate job and do not possess skills
29 necessary for employment in the workforce. But, WITSEC will provide job training and
30 employment assistance. Ultimately, we expect the witness to gain lawful employment to support
31 the day-to-day living expenses needed, and the subsistence is terminated. WITSEC was not
32 designed to provide lifelong subsidies to former criminals turned government witnesses. It was
33 intended only to protect them from harm by giving them new identities, and help them become
34 self-sufficient to have a start on a new life without crime.

35 For security reasons, we require witnesses to keep their new identity and relocation a
36 secret from their relatives and friends from the past. Secrecy is critical. I tell everyone entering
37 the program, "don't tell anyone where you have been relocated," and then I add "I mean
38 anyone," because everyone thinks they can trust someone. We also mandate that they not return
39 home. As time passes, they forget the danger that still exists, and the desire to go home and get
40 in touch with family and friends becomes overwhelming. Understandably, this is one of the
41 most difficult tasks for the witnesses and their families. The people we are trying to protect are
42 clannish. Families are important to them. Often, the extended families live within blocks of
43 each other. WITSEC wipes out entire families in order to protect the witness and immediate

1 family - - no more visits with grandparents, no parties with cousins, no contact with old friends.
2 If a relative dies, they cannot go to the funeral. We take away their pasts – the good and the bad.

3 We also tell participants in the program not to tell anyone new they meet that they are in
4 the witness protection program, including neighbors, new friends, or co-workers. There are no
5 options. WITSEC is a program of last resort. It is absolutely necessary to follow the U.S.
6 Marshals Service’s guidelines to save their lives, even though we understand it is easier said than
7 done. The children in the witness protection program became the most resentful. They have
8 nothing to do with the criminals or their crimes, yet they feel as if they are being punished. They
9 are forced to suffer isolation from anyone who ever cared about them and they project a lie about
10 who they are to everyone they meet in the future.

11 There are complaints and criticisms about the WITSEC program from participants in the
12 program. The witnesses or families do not like the new community where they have been
13 relocated; or they cannot find a job that is suitable to them. They feel isolated. They feel like
14 they are living a lie. In a nutshell, they want their old way of life, just without the danger. But
15 for every one participant that cannot adjust to the changes required, 1000 participants have a
16 successful transition. A successful relocation is one where the witness forgets he has been
17 relocated, and doesn’t need to look over his back. I know witnesses who are now grandparents,
18 and their grandchildren don’t have a clue about their grandparents’ past. We helped change and
19 save three generations of lives. Nevertheless, for those participants who are unsatisfied,
20 WITSEC is completely voluntary. Protected witnesses can drop out at any time, no strings
21 attached.

22 No WITSEC participant, that has followed the program guidelines, has ever been harmed
23 or killed while under the protection of the U.S. Marshals Service. Unfortunately, not all
24 witnesses take the threat on their lives seriously. Some have left the program of their own
25 volition or have broken the rules about returning to high-risk areas. Five witnesses were slain
26 after relocation when they ignored the program guidelines, warnings, and cautionary advice from
27 the U.S. Marshal in charge. For example, one such witness, after being relocated, bragged about
28 the crimes he did and his “associations” with mob guys. He invited danger to come looking for
29 him. Within a week, he was found in a 55-gallon oil drum bobbing in the Miami Biscayne Bay.
30 Many times though, crossing the line is less brazen, and often occurs when a witness ignores the
31 program’s warnings about returning home. Daniel LaPolla was identified as the first WITSEC
32 witness murdered by the mob. He had come out of hiding to attend a funeral. After the
33 ceremony, he stopped to check on his home and a booby trap exploded, blowing him to
34 pieces. We also have had a few witnesses that opted out of the program, and were subsequently
35 murdered by the Mafia. They thought they could hide on their own or make amends with those
36 they testified against.

37 Lou Contralto’s death does not blemish our perfect record. I was responsible for
38 protecting Lou from the Mafia, not some enraged neighbor. Lou Contralto died at the hands of
39 Rowan Hyde, not the Mafia.

40 As the agent in charge of the safety and security of Lou Contralto, it was my
41 responsibility to know his file backward and forward. You have to really know the person you
42 are protecting, if you are going to keep them out of harm’s way. Based upon my review of Lou

1 Contralto's criminal history and interviews with him, I believe that I knew Contralto about as
2 good as anyone, or better. Of course, with these guys there is always something they hold back.
3 There is a trust issue, particularly with law enforcement.

4 Lou Contralto was a loan collector for a dangerous organized crime gang known as the
5 Tessitura Mafia family based in Chicago. As an associate, Contralto was establishing himself
6 within the family and expected to be a button man. A button man is an associate who has earned
7 their button to becoming a "made man." Before being inducted as a made man, a contract killing
8 is generally required to prove loyalty to the Mafia family. Made men are the only ones who can
9 rise through the ranks of the Mafia, from soldier to caporegime, consigliere, underboss, and boss.

10 Contralto had no formal education. He dropped out of high school at 16. He never held a
11 legitimate job, but rather lived and learned off the streets of Chicago. As a loan shark for the
12 Tessituras, Contralto used intimidation, both threats and physical harm, to collect on loans owed
13 to the family. At times, Contralto was reckless, resulting in several run-ins with the law between
14 1986 and 2007. In the beginning, it was just petty crimes. He was convicted of criminal
15 mischief, criminal trespass, professional gambling, and intimidation. Contralto was flamboyant
16 and liked to live life on the edge, and in the later years of his life of crime, he became more
17 brazen. He was charged with several additional crimes, including bribery, arson, loan sharking,
18 and battery. None of these resulted in convictions. The Tessitura family made the witnesses
19 disappear or the cases go away. Still, Contralto was taking risks that might expose the family.

20 Then, it all began to unravel for him. In 2007, Contralto had been investigated in the
21 death of Dee Frost, a co-owner in a restaurant in Dyer, Indiana. Frost had been murdered - -
22 frozen to death in a commercial freezer at her restaurant. Investigators learned that Frost had a
23 gambling addiction and was behind in substantial loans owed to the Tessituras. Frost had no
24 means of paying the loans and had missed multiple payments. Contralto had been at the scene of
25 the crime on the night of the murder. When Contralto was taken into police custody, this time
26 the Mafia didn't clean up his mess.

27 However, after talking to investigators, no charges were filed against Contralto, raising
28 suspicions within the ranks of the Tessituras. In addition, charges against Contralto for loan
29 sharking were dropped. Frost's business partner was charged with Frost's murder and Contralto
30 was a key witness. At that 2008 trial, Contralto stated on the witness stand, "I'm testifying in
31 this case because the prosecutor made me an offer I couldn't refuse." Also during the trial, a
32 jailhouse snitch, J.L. Byrd, testified that Contralto had admitted to icing Frost thereby bringing
33 more scrutiny of the Tessitura mob. Contralto, of course, denied to law enforcement that he was
34 involved in the death of Dee Frost.

35 Contralto initially didn't make a deal to spill his guts about Mafia business, but the
36 Tessituras thought he did. Even if you aren't going to rat, if someone thinks you are, then you're
37 going to end up being whacked, and you might not ever have said a word to law enforcement.
38 Contralto had fallen out of favor with the family. Contralto was nervous that he might be on a
39 hit list. Word on the street was that it would be bad business for an insurance company to issue a
40 life insurance policy on Contralto because he might not be living too much longer. To make
41 matters worse, Contralto, thinking he could disappear on his own, embezzled money from the
42 Tessitura crew.

1 Two days before Lou had planned to leave town, his wife, Donatella Contralto, was
2 murdered. The hit was actually intended for Lucky Lou. On March 13, 2008, Donatella decided
3 to take Lou's car to pick up Ricci from school because it was raining. When Donatella turned
4 the ignition key, a bomb rigged to the ignition switch exploded. Fearing for his life and Ricci's
5 life, who was nine years old at the time, Contralto requested witness protection in exchange for
6 testimony against key players in the Tessitura crew. Contralto could remember dates, times,
7 names and details. He was an important witness that led to the convictions against one of the
8 underbosses, Alfredo Carbonara, and two hitmen of Tessitura's crew Cy Lance and Max Marx.

9 During the time that Lou Contralto was testifying, he and Ricci were under full protection
10 of the U.S. Marshal Service. I was assigned as the Marshal in charge, and while the three trials
11 were pending, two additional marshals assisted in the securing the safety of Lou and Ricci.
12 Staying close to Chicago for the trials, we holed up in motels throughout Northwest Indiana,
13 Northern Illinois, and Southern Wisconsin, moving frequently to avoid suspicion and detection.
14 Ricci was withdrawn, despondent. Ricci blamed Lou and the government for the death of his/her
15 mother. We were the bad guys in his/her mind. I told Ricci that he/she could not stay in touch
16 with family or friends and that he/she had to forget his/her past. Ricci was pulled out of school
17 when first placed in witness protection and during the trials against the Tessitura crew. Ricci
18 hated the forced changes to his/her life.

19 The trials against Carbonara, Lance, and Marx ended in April, 2009. Once we had the
20 convictions, the full-time, round the clock protection service ended for Lou and Ricci, and we
21 moved to the next phase. Lou and Ricci were given new identities, new social security numbers,
22 new school records and birth certificates. For the first year post-trial, I touched base with Lou
23 regularly - - two to three times a week. The first two years are usually the most critical because
24 the witness and the family members need assistance transitioning to the new life, and also the
25 threat of a revenge hit by the Mafia family is heightened.

26 Shortly after the Tessitura crew convictions, I received a tip from an informant that Tony
27 Tessitura had ordered a hit on Lucky Lou. The hitman was Joey "The Knife" Carver. Joey's
28 "signature" is slicing the victim's throat or cutting out the tongue as a retribution for talking to
29 the police. Joey has a reputation for executing witnesses and informants in gruesome fashion.
30 Sometimes, he mutilates bodies of witnesses and informants. He even is known for yanking out
31 internal organs as a crude warning against an informant spilling their guts. To this day, however,
32 we have never been able to pin anything on him.

33 After the trials, Lou and Ricci Contralto were relocated five times in a span of seven
34 years. With each relocation, they received new identities. The shortest stay was two months; the
35 longest stay, the last, was three years. At first, Lou didn't always follow our guidelines to the
36 letter. When I learned of the breach of the guidelines, I didn't take the risk of keeping them in
37 the same location. Only one of those moves, the third move, was the result of a probable threat
38 to Lou's life. I learned through an informant that Joey Carver was zeroing in on Lou's relocation
39 because Ricci had contacted his/her grandparents, and their phone was bugged, unbeknownst to
40 the grandparents or Ricci. I can tell the witnesses and their families a million times to leave the
41 past behind, but inevitably they contact someone from their past. Usually, it only takes one time
42 to get that close to death, and the mistake is never repeated. The reason for the last couple of
43 relocations were innocent or accidental, but still created a risk. For example, Lou had been

1 spotted by one of his old friends from Chicago at a casino, or another time Lou had his picture in
2 a local paper after winning \$5,000 in a lottery scratch-off. Exhibit 2 is a true and accurate
3 compilation of the dates of Lou's various relocations, and the reason for the moves. I have not
4 included the locations of the relocations for the security and protection of current or future
5 protected witnesses. I created this compilation based upon my personal knowledge of the
6 relocations at the time they occurred.

7 As time passed, it was less critical for me or the U.S. Marshal's Service to have as much
8 frequent contact with the Contraltos. As time progresses, the witness and family members have
9 an easier time assimilating into a new community and need less assistance from the U.S.
10 Marshal. Also, the witnesses understand better why adherence to the established guidelines is
11 for their protection. On the other hand, witnesses can become more complacent and can forget
12 about those most important guidelines. After the first year following the trials, I found it
13 unnecessary to contact Lou every week. Sometimes in the latter years it would be a few months
14 between follow-up communications. When I was reassigned to Brooklyn in 2010, my new job
15 responsibilities limited the time I had available to contact Lou. However, Lou and Ricci had my
16 direct dial telephone number and were told that if anything suspicious or of concern to them ever
17 occurred, they were to contact me and I would drop everything and see to their safety and
18 protection. I do not keep logs of the communications I have with my witnesses or their family
19 members. I have an excellent memory – nearly photographic. More important, it is risky to the
20 witness and family members to have written documentation that could possibly be intercepted
21 and then used by a hitman or Mafia member to harm or kill the witness and family member.

22 Neither Lou nor Ricci contacted me between 2013 and 2016 with any suspicions that
23 would lead me to believe that a hitman was an imminent threat. Otherwise, I would have
24 immediately relocated them to another community. In fact, I have no recollection of receiving
25 any calls, except for one call on July 4th, 2016 from Ricci. He/she was nervous about hearing a
26 gunshot. I immediately spoke to Officer Jerry Bilt, who investigated the matter at my request.
27 Officer Bilt determined that the sound heard by Ricci was a firecracker that had been set off.
28 There were no other calls, as far as I recall, except for Ricci's call on September 13, 2016 to
29 report that Lou was missing. If Ricci observed suspicious events in the days and weeks prior to
30 Lou's death, he/she may not have mentioned it to me for fear that yet another relocation would
31 be required. After this last relocation to Crown Point, Ricci was angry and adamant that he/she
32 was tired of moving. I was never made aware of possible secret meetings that Lou Contralto
33 may have had with former Tessitura cohorts. Regardless, if a hitman was closing in on Lou and
34 Ricci, there likely would have been some chatter from informants or undercover moles. There
35 were none.

36 When Lou and Ricci were relocated to Crown Point, Indiana, they assumed the identities
37 of Lou King and Jo King, respectively. I was against Lou using his real first name. I had begun
38 preparing the paperwork for his identity to be Lee King, but he was able to manipulate the
39 paperwork, and it went in as Lou King. Due to the number of years that had passed since the
40 trial, I was not overly concerned or I would have changed his name right back. I spoke with the
41 local authorities, specifically Officer Jerry Bilt, that the Kings were in the witness protection
42 program and that they may need protection. I asked Officer Bilt to keep an eye out for anything
43 suspicious. The government set up Lou in his own business in Crown Point. The business was
44 in the sale and installation of underground electric fences for homeowners to keep their pets

1 within certain parameters in their yard. The franchise was called No Escape. I had some
2 legitimate concerns about putting Lou in the position of being invited into people's homes and
3 scouting out their properties, and possible security. Lou was an opportunist, and I thought it
4 possible that he might go back to a criminal life and contact prior criminal associates. That was
5 always our concern for the criminal witnesses we protected. We were cautious, even though
6 statistically few WITSEC witnesses return to a life of crime. WITSEC has a higher
7 rehabilitation rate than any other government program. Lou kept his nose clean. WITSEC did
8 not receive any reports from local authorities that Lou was engaged in criminal activities. In
9 fact, I recall having a couple of conversations with Lou about the business. When we first set
10 him up in the franchise, Lou seemed enthusiastic about being his own boss. The other
11 conversation was about a year later, and Lou said he was figuring out how to make more money.
12 I think he wanted to grow and develop the business further.

13 I am the closest thing the government has to an insider in the mob. I know everybody
14 who is anybody in the mob. I know their habits - - where they are, what they do, and how they
15 think. I have reviewed the testimony of Officer Jerry Bilt as well as the investigation report and
16 all of the forensic evidence looking for any shred of evidence that Lou Contralto was murdered
17 by the mob. Based upon my expertise and my review of the evidence, I can say unequivocally
18 that the death of Lou Contralto was not a mob hit.

19 Men and women within organized crime have a particular signature when committing
20 crimes, which takes one of two avenues: either (1) committing the crime in such a heinous
21 fashion so as to send a message to other would be wrong-doers against the mob/Mafia, or (2)
22 skilled use of hiding the crime or their connection to it. An example of the former is the Italian
23 rope trick. The Mafioso wraps a rope around the victim's neck and a tug of war ensues as the
24 victim is strangled to death. Also as a public warning, the mob, on occasion, tied victims to a tree
25 in the wilderness and slashed the victim to draw blood for wild animals to feed upon.

26 In this case, the Tessitura family had arranged for Joey "The Knife" Carver as the hitman
27 to eliminate Lou Contralto. The Knife is known for his gruesome killings for anyone who breaks
28 the *omerta* code. He was not merely satisfied with slashing the throat, rather he would remove
29 the tongue, or create the Sicilian necktie, where the throat is slashed and the tongue pulled
30 through the opening. None of those classic signatures of Joey "The Knife" Carver were present
31 in this case.

32 Organized crime's use of hiding the crimes or their connection to the crime also
33 definitely has its own signature. Compared to a non-career criminal, it is far more sophisticated
34 and skilled. Disposal methods included dismemberment, burial - often in cement in the
35 foundations of buildings, or placing the body in the trunk of a car and having it crushed in a
36 junkyard. Another popular "signature" method of the mob is to hide a corpse in a false bottom
37 of a casket of another person. The disposal is not hurried. It is planned and methodical, also as
38 much about making a point, as the death itself. Yes, we've probably all heard of "swimming
39 with the fishes" in which the mob ties the victim to a cement block and throws them in a body of
40 water. On the surface, it might appear that Contralto's body disposal looks like a mob hit. But,
41 the investigation report suggests that the ropes around the body tied to the cement block were
42 hastily tied and haphazard, like someone in a panic, not a planned execution and disposal. I
43 admit that I was not present during the crime scene investigation. I also am not a forensic

1 analyst. I have seen my share of mob hits though. If Contralto's death itself had looked more
2 like a mob hit, I too might be convinced that the disposal was similar to a mob hit style. Of
3 course, one can never rule out a copycat killer, i.e. where a person mimics the style of killing or
4 body disposal that they have heard about either through print, news media, or television and
5 movies. There probably isn't a person over the age of 16 who can't name at least one mob
6 movie or television show.

7 I also can firmly say that I know this was not a mob hit, because I would have known
8 about it. I have my ear to the ground on the stirrings within the Mafia. We have informants and
9 undercover operatives who intercept information if a protected witness has been located. That
10 was the case with the other relocations of the Contraltos. They had been located, or there was a
11 possibility that they had been seen or discovered, so we removed them immediately to another
12 location. Similarly, after the fact, I would have expected to hear word on the street that Contralto
13 had been killed. Nothing. No bragging rights or cheers that the guy who turned on them was
14 dead. I only learned about Contralto's death from the local police and Ricci. Otherwise it was as
15 if nothing happened.

16 Based upon my review of the testimony of Officer Jerry Bilt as well as the autopsy report
17 and investigation report, I have reached the same conclusions as Officer Bilt. It is my opinion
18 that Rowan Hyde murdered Lou Contralto.

19 *I affirm under penalty of perjury that the foregoing is true and correct to the best of my*
20 *belief and knowledge.*

21 Garren Teed
22 GARREN TEED

1 **Statement of Detective Jerry Bilt**

2 My name is Jerry Bilt. I was born and raised in Gary, Indiana. I graduated from Lew
3 Wallace High School in Gary in 1998. I have a Bachelor's Degree in Sociology with a
4 concentration in Criminology from Valparaiso University. I am also a graduate of the Indiana
5 Law Enforcement Academy in Plainfield, Indiana, and I hold a certification from ILEA in Crime
6 Scene Investigations. I currently reside in Crown Point, Indiana.

7 Law enforcement has been a part of my whole life. My mother and father, until their
8 retirement, served as law enforcement officers with the Lake County Sheriff's Department. My
9 baby sister, Ree, also served with the Lake County Sheriff's Department for seven years in Jail
10 Transportation and the Community Workforce Program, helping inmates and young gang
11 member to rebuild their lives by contributing to society through community service projects,
12 rather than working against the community through criminal activity. Four years ago, Ree did
13 some rebuilding of her career and seized an opportunity to work in the United States Marshal's
14 Service in its Chicago office, assigned to witness transportation and assisting with security
15 services, as needed, in the Witness Protection Program.

16 I am a Detective in the Investigations Division of the Lake County Sheriff's Department.
17 I began my career with the Lake County Sheriff's Department in 2001. Initially, I was assigned
18 in the Patrol Division and K-9 Unit. Subsequently, I served as an Evidence Technician in Crime
19 Scenes Investigation and later was assigned as a Detective in the Gang Crimes Unit. Then I
20 returned to the Patrol Division as a Supervisor and Field Training Officer. In my current
21 assignment with the Detective Bureau of the Investigations Division, I am the Lead Detective for
22 investigating and solving homicides.

23 I have received several awards and commendations throughout my service with the Lake
24 County Sheriff's Department. I am a past recipient of the Indiana State F.O.P. Chris Anton
25 Award, for dedication to law enforcement and leadership abilities. I am also the recipient of the
26 Indiana State F.O.P. Addie Maddox Award, considered to be the most prestigious law
27 enforcement award in Indiana. I recently received the C. Dunlap Service Award in recognition
28 of outstanding efforts for a proactive and cooperative approach to law enforcement.

29 According to the 2010 census, the population of Lake County was 496,005, making it the
30 second largest county in the state. Given its close proximity to Chicago and Chicagoland gangs,
31 the Sheriff's Department's mission is to reduce crime by providing the citizens of Lake County
32 with a prompt and effective investigation response to all classifications of criminal cases. The
33 Sheriff's Department works with other law enforcement agencies to achieve its goal, including
34 the local town and city police departments in the area, the Northwest Indiana Major Crimes Task
35 Force, the Federal Bureau of Investigations, and the United States Marshal's Service.

36 As the Lead Detective in Homicides, I am responsible for the investigation of suspected
37 homicides. Those tasks involve gathering information from a variety of sources, conducting
38 interviews, and working as an integral unit with the crime scene investigation team for the
39 recovery of evidence through the collection, packaging, preservation, and presentation of
40 physical evidence for major trials. Preservation of the evidence can include photography. The
41 Photography Section of the Unit is responsible for the development and printing of crime scene

1 photographs. All cities and towns in Lake County utilize the services of the Lake County
2 Sheriff's Department for the criminal investigation of violent crimes. The Detective Bureau
3 ultimately prepares the criminal cases for a successful conclusion at trial, utilizing the CSI
4 physical evidence in conjunction with the field investigation work.

5 I have attended numerous seminars, training courses and lectures to further develop my
6 skills in crime scene investigations. Many of the training courses have been through the Public
7 Agency Training Council. A sampling of some the training I have received, include Bloodstain
8 Pattern Evidence Analysis for Crime Scene Reconstruction; Death and Homicide Investigation
9 (5-day course); Forensic Pathology for Investigators; Homicide: The Investigative Challenge;
10 Homicide and Questioned Death Scene Determination and Reconstruction; Homicide
11 Investigation: From the Crime Scene to the Courtroom; and Solving Homicides: Investigative
12 Steps to Success.

13 A little more than three years ago, I was contacted by United States Marshal Garren Teed
14 regarding witness protection for a protected witness, "Lucky" Lou Contralto, who had turned
15 State's Witness and assisted with the convictions of key members of the Tessitura Mafia family.
16 Mr. Contralto had testified in 2008, but the family continued to receive the government's
17 protection because it was well known that the Tessitura family had a hit on Contralto and/or his
18 son/daughter, Ricci Contralto. My sister, Ree, had recommended me to the U.S. Marshal's
19 Office as a person who was trustworthy and dependable. Marshal Teed was the Agent in Charge
20 of the Contraltos' protection, but operated out of a New York Office. He/She needed a local
21 contact to act as a liaison with Teed and the Chicago U.S. Marshal's Office, but would also be
22 able to be the eyes and ears locally for any suspicious activity. I was not assigned responsibility
23 of ensuring the safety and security of the Contraltos; that task was solely the responsibility of the
24 U.S. Marshal Service. The Contraltos had Marshal Teed's contact number for their needs and
25 concerns, as well as a special number to dial in the event they believed they were at immediate
26 risk. It was my responsibility to handle any "local matters" and provide assistance as needed.
27 After undergoing the vetting process, I was approved as the local liaison. The Contraltos true
28 identity was to remain secret and was not to be shared with anyone. Other than the U.S.
29 Marshal's Office, the only persons who were aware of the Contraltos' Witness Protection status
30 were the Sheriff, the Commander of the Patrol Division, and me.

31 At the time of my new assignment involving the Contraltos, I had been working in the
32 Gang Crimes Unit as a Detective. In order for the Sheriff's Department to cooperate and best
33 assist the U.S. Marshal's Office, my superiors returned me to the Patrol Division. In the Patrol
34 Division, I would have better opportunity to respond immediately to any matters concerning the
35 Contraltos without raising eyebrows as to why a Detective in the Gangs Crime Unit was
36 responding to domestic matters.

37 On June 28, 2013, I met with Marshal Teed for a briefing prior to the Contraltos arrival in
38 Crown Point. The meeting was my one and only face to face meeting I had with Teed. Marshal
39 Teed provided more detail regarding Lou Contralto's background in the Chicago Tessitura crime
40 family and his decision to turn State's witness after his wife had been murdered in a car bomb
41 intended for him. Contralto had one child, a son/daughter, Ricci that was also in the witness
42 protection program and could be equally at risk as a pawn for the Mafia to get back at Lou. Boss
43 Man Tony Tessitura had put Joey "The Knife" Carver on the trail to kill Lou Contralto, and the

1 government had always stayed one step ahead. The Contraltos were relocated with new
2 identities numerous times over a seven to eight-year period. There was no indication that the
3 Contraltos were any safer merely because of the passage a time. It was said that Tony Tessitura
4 never forgot a wrong.

5 Ricci would start his/her senior year of high school at Crown Point High School. Fake
6 school records, birth certificates, voters' registration, and social security cards had been provided
7 to the Contraltos. Teed provided me with a dossier of the Contraltos' current fabricated
8 identities. I was informed that the new identities under the witness protection program would be
9 Lou King and Jo King. The government had purchased a fully furnished and supplied home for
10 the Contraltos in Hidden Links Estates, an upscale quiet neighborhood situated on one of the
11 area's premier gulf courses. Mr. Contralto would be set up as a business owner of a franchise for
12 hidden fencing systems for pet protection. The Contraltos would move into their new home on
13 Monday, July 1st, 2013.

14 Marshal Teed gave me further instruction that I was not to draw any attention to the
15 Contraltos. I also was not to maintain any written or electronic records that could be intercepted
16 or hacked, thereby exposing the Contraltos to risk. All precautions had to be taken to prevent
17 discovery of their true identities and ultimately risk the Contraltos safety. Before the meeting
18 ended, I had returned the Contraltos' dossiers to Marshal Teed to dispose of "properly." Toward
19 the end of my three-hour meeting with Marshal Teed, I was introduced to Lou and Ricci
20 Contralto, aka Lou and Jo King. Marshal Teed wanted them to know who I was. The Contraltos
21 were told that I was the local support, and that I could be trusted as the liaison when Teed was
22 not available. Teed explained to the Contraltos that the Sheriff and my Commander would
23 arrange to have any calls directed to me if it concerned them.

24 My instructions had been that I was not to do anything that called attention to the Kings.
25 Sure, no problem. But if you put lipstick on a pig it is still a pig. Lou King was not one that
26 "blended in." He was a flashy dresser: silk shirts, silk suits, gold chains, Italian shoes, and a sort
27 of pompadour hairstyle. My thoughts were "Really? Hide this?" But the nice thing about
28 Crown Point and the Hidden Links neighborhood is that no one cared about one another's
29 business. However, I was a little concerned about Claire Day. He/She is one of those nosy
30 neighbors, watching everything going on. Then again, I thought Day might be a valuable
31 resource. If anything suspicious did occur, he/she would know it. Day's only problem is that
32 he/she tends to exaggerate. I think it's because he/she watches too much television and feels the
33 need to embellish to make reality more like the dramas on television. My feeling was that it was
34 better to have the extra lookout, even if at times it might be exaggerated. An ounce of prevention
35 is worth a pound of cure.

36 Honestly, when I was assigned the job, I didn't expect I would be needed much. The
37 Contraltos had been in numerous communities for relocation prior to the move to Crown Point
38 and had been able to adjust to each new environment. They knew the routine. They knew how
39 to redirect awkward questions about the past. What I didn't calculate in the equation were two
40 things: (1) the Contraltos had always lived in a big city, and didn't know how to blend into a
41 residential neighborhood in a mid-size community; and (2) the years of running and hiding and
42 not being caught had made them complacent. Lou, especially, seemed like he thought he could
43 take more risks and that he wouldn't be discovered by the Mafia, or if he was discovered that

1 they would be forgiving. He didn't act like he feared that he had a target on his back. He was
2 loud. He was boisterous. He was obnoxious.

3 It didn't take long for the Contraltos to need my assistance. On the evening of July 4th,
4 2013, I received a call from Marshal Teed. He/She told me that Ricci had called him/her,
5 nervous that the Tessitura family was in Crown Point and was going to kill Lou and Ricci. Ricci
6 had heard a loud noise that he/she said sounded like a gunshot. Teed asked me if there had been
7 any leak in the identities and location of the Contraltos. I answered in the negative. I assured
8 Teed that I would immediately investigate the situation, and if I believed the Contraltos were in
9 any jeopardy, I would secure a temporary safe location for them. After scoping out the
10 neighborhood, and talking with Lou and Ricci, I determined that the presumed gunshot was, in
11 fact, fireworks. Lou said "I knew it. I really don't need you guys anymore." But Ricci was
12 nervous, and asked me to stay for a little longer just to "be safe." Ricci told me, in confidence,
13 that he/she was worried about being so close to Chicago – so close to the Tessitura family. They
14 had never lived that close with any of their other relocations. Maybe it was bad dreams,
15 remembering the loss of his/her mother, or maybe it was a premonition – he/she didn't know.
16 The concern, according to Ricci, was that Lou seemed to not care anymore about hiding. Ricci
17 overheard parts of Lou's telephone conversation the day they moved to Crown Point regarding
18 "getting back in the business." Ricci said he/she was not naïve as to what was going on and what
19 would happen.

20 Only a few days had passed from the July 4th drama, and I was called back out for
21 concerns involving the Contraltos. Dispatch reported that Claire Day heard a heated argument
22 between Lou King and Rowan Hyde, King's next door neighbor. Day had reported that threats
23 had been made and a butcher knife had been brandished. When I pulled up in the patrol car in
24 Hidden Links Estates, I heard Lou Contralto, a.k.a. Lou King and Rowan Hyde arguing. I saw
25 Hyde with a switchblade, pointed at Lou King and threatening "You'll pay for this." He/She had
26 a look of pure rage. I yelled for everyone to calm down. Then Hyde threw the knife forcefully
27 to the ground, so that the point was stuck in the ground and the handle wobbled from the force of
28 the throw. As I investigated the matter, I learned that the feud began over a landscaping issue.
29 Can you imagine if it had been something more important? Anyway, my main goal was to
30 diffuse the situation. So, I suggested to Hyde to take the matter up in a small claims court. I
31 calmed the situation down and said no charges would be filed. Hyde, still fuming, said angrily
32 "What good is the law? You might as well take matters into your own hands."

33 Claire Day reported other disturbances between King and Hyde that occurred over the
34 three-year period of July, 2013 through the present. Each time, I brokered a peace deal for a
35 temporary ceasefire. The disputes evolved from the landscaping problem to nuisance complaints
36 - - noise, bright lights, more noise, Hyde's dog barking, Hyde's dog acting aggressively. Each
37 time I was able to calm them both down. I never made any arrests for these spats, or filed
38 criminal charges. I had hoped diplomacy would be the best tactic. Also, I was conscientious that
39 if charges were filed that it could catch the attention of the Tessitura crime family. It was all
40 petty stuff, but it's one of those things where it just keeps building and building and building.
41 Soon, it's like a pot ready to boil over. I don't believe, however, that there was any disturbance
42 at least a month prior to Lou King's disappearance. I thought maybe it was all settling down.

1 I also made several trips to the neighborhood over the three year period for noise
2 complaints and domestic disturbance involving Lou and Jo King. Like the noise complaints
3 involving Lou and Rowan, I did not make any arrests or file any charges for the fights between
4 Lou and Jo out of an abundance of caution to drawing the attention of the Tessitura crime family.
5 Their fights, too, were often violent. No punches thrown, but household objects were hurled
6 against walls, and yelling, screaming, and threats were always involved. I overheard Ricci aka
7 Jo, say a number of times that he/she hated Lou. Sometimes the words were “I wish you were
8 dead.” When I spoke to Ricci about the hateful words, he/she told me that he/she resented
9 his/her father for getting his/her mother killed. He/She was concerned that Lou, was acting
10 careless with the mob again, and it could cost both of their lives this next time. Even though
11 Ricci said hateful things, his/her concern was to save their lives. Ricci told me that he/she could
12 not bear losing another parent. The one thing that struck me with all of these fights was that Lou
13 could get under a person’s skin and push them to the edge, or maybe even over the edge.

14 The pressures of the lives that the Contraltos lived were something that we cannot begin
15 to understand. They always had to keep one eye looking over their shoulder. It seemed like they
16 lived like kings, but experienced the isolation like kings too. About one year ago, the stress
17 caused Jo to snap. He/she vandalized Clare Day’s house by spray painting one of the windows
18 black. I wanted to resolve this matter, too, without filing any charges. But, Day insisted that Jo
19 be taught a lesson. I ceded to Day’s demands. I thought publicity of the incident, if any, would
20 not draw the Mafia’s attention because it involved Jo. Jo was charged and pled guilty to
21 Criminal Mischief and Criminal Trespass. As part of the plea agreement, Jo was required to
22 perform community service. It was an opportunity for Jo to channel his/her energies to
23 something positive. Jo served his/her community service at the local Humane Society. Rowan
24 volunteered at the Humane Society too. They were able to find common ground and became
25 friends.

26 Claire Day’s recollection of how often the police were in the neighborhood to handle
27 disputes is exaggerated. Day watches a little too much television and has a tendency to distort
28 reality. My recollection is that over the three-year period from July 2013 through September,
29 2016, I attended to a disturbance call involving Lou King no more than a dozen times. There are
30 no records of the police calls for domestic disturbances or neighborhood feuds involving Lou
31 King. I did not document the times I went to break up an argument or settle heated positions
32 between Lou and Rowan, or between Lou and Ricci/Jo. I did not keep any written records of
33 those instances because it was a priority to maintain a low profile for the Contraltos. Any report
34 of a call to their neighborhood would be included in the police blotter in our local newspaper.
35 Crown Point and the Little Italy neighborhood of Chicago is approximately one hour away. So,
36 it was not too far-fetched for Tessitura to have fingers reaching into Lake County. Not recording
37 and documenting the dispatches to the Hidden Links neighborhood was against Department rules
38 and policy. Sometimes you have to be flexible with Department rules. They’re more guidelines,
39 anyway. What’s more important? Documenting every spat between neighbors and family
40 members or protecting someone’s life?

41 Although I did everything in my power to keep the Contraltos from being discovered by
42 the Mafia, Lou did not seem to put any effort into trying to be unnoticeable. Lou drove around
43 in expensive cars and flashed around money. His actions drew attention because he closed only
44 a few contracts for business sales. However, even though I always tried to be vigilant of

1 anything suspicious, I was not aware of any red flags that the Mafia was closing in on Lou. I
2 knew Claire Day would notify me if he/she had spotted any suspicious characters in the
3 neighborhood. There were no such reports because the Mafia was still clueless that the
4 Contraltos were now located an hour away.

5 While I was looking in the direction of a mob hit, I was blind-sided by the murder of Lou
6 Contralto at the hands of an angry, tormented neighbor. Ricci Contralto reported his/her father's
7 disappearance on Tuesday, September 13th, 2016, and Lou's body was found floating in Cedar
8 Lake on Wednesday, September 14th, 2016.

9 When the body was located, I immediately observed a slashed throat, which appeared to
10 be the cause of death. The autopsy confirmed that a knife cut the neck and ended the life of Lou
11 Contralto. The time of death was established as sometime between 19:00 hours on September
12 10th, 2016 and 06:00 hours on September 11th. Due to decomposition, a more precise time of
13 death could not be determined. The autopsy also noted a blunt blow to the back of the head,
14 perhaps from a stick or club, or possibly from a fall. However, the blow was not the cause of
15 death. It was further noted that there were ropes around the body, which appear to have been
16 tied to a cement block. The ropes appeared to be hastily tied and haphazard, suggesting someone
17 was in a panic, and that this was not a planned execution and disposal. A roll of cash, \$700, was
18 found on the body. However, there was no ID located on the body.

19 According to Ricci, Lou Contralto had been missing since Friday night, September 10th.
20 Lou was last seen walking over to Rowan Hyde's house. Ricci did not immediately report that
21 Lou was missing, because it was not unusual, according to Ricci, for Lou to be gone for a few
22 days. Ricci apparently suspected that Lou was connecting with old "friends" in Chicago. When
23 Ricci reported his/her father missing, I was certain that Lou would return from one of his
24 escapades, and then we would discuss whether he was going to abide by the rules, or be
25 relocated to yet another city, and start all over again.

26 When the body was located, I was assigned to investigate the suspected homicide. I had
27 been promoted to a Lead Detective position in the Detective Bureau of the Investigation Division
28 effective January 1, 2016. My understanding of the history and background of all the players in
29 this case was invaluable and helped in my investigation. To be quite honest, my initial instinct
30 and presumption was that it was a mob hit. It seemed like the most obvious scenario was that
31 Tessitura's crew had located Contralto and had him executed mob style with a slashed throat and
32 the body dumped and submerged. Murder from a neighborly dispute gone badly was remote.
33 But the evidence contradicted my initial theory.

34 When conducting a homicide investigation, I clear myself of all presumptions and let the
35 evidence lead me instead. Otherwise, the presumptions can possibly steer the direction of the
36 collection and interpretation of the evidence. I met with Ricci Contralto and learned that on the
37 evening of Friday, September 10th, Lou was angry yet again over Rowan Hyde's dog, Grendel,
38 for yet another perceived offense. Lou had threatened Rowan that he was taking Grendel that
39 evening to have him euthanized. Ricci was unconvinced that Rowan had anything to do with the
40 suspected homicide. Rather Ricci reported that he/she believed that the Mafia had located them.
41 In support of his/her assertion, Ricci described having observed suspicious strangers hanging
42 around the neighborhood and near his/her school, sitting in the car and watching their

1 movements. Ricci stated he/she had raised these concerns to Marshal Teed a week or two prior
2 to Lou's death, but nothing had come of it. Certainly, I was never made aware of the suspicious
3 strangers lurking in the neighborhood. Otherwise, I would have investigated it immediately.

4 I then interviewed Rowan Hyde. Rowan freely spoke to me and did not lawyer up.
5 He/she also granted full access to his/her home. Rowan said that he/she had nothing to hide.
6 During my interrogation of Rowan, his/her account placed Lou Contralto at his/her home at
7 approximately 19:32 hours on September 10, 2016. Rowan stated that Contralto had barged into
8 the front foyer of his/her house. Lou had demanded taking Grendel to have the dog euthanized.
9 Rowan asserted that he/she intended to fight it, and thus would not release the dog unless there
10 was a court order. Lou lunged toward Grendel, who then went into full attack mode. Grendel bit
11 Lou several times on the hand and forearm. The bites marks observed on the hands and arm as
12 reflected in the autopsy report are consistent with Rowan's account. Rowan also described Lou
13 pulling out a switchblade and stabbing Grendel relentlessly. Grendel finally collapsed on the
14 foyer rug, and bled out. According to Rowan, Lou then left the house, holding pressure on some
15 of the puncture wounds caused by Grendel. Rowan assumed that Lou was returning to his/her
16 home. Rowan was consumed with grief of the death of Grendel and said he/she did not pay
17 much attention to Lou's departure from the house or even whether he/she was around over the
18 weekend. Rowan described Ricci Contralto's follow-up visit on Sunday evening, September
19 11th, inquiring as to the whereabouts of his/her father. Rowan said that when Ricci talked to
20 Rowan about Lou's absence, Rowan was equally puzzled.

21 At the scene, I used luminal to determine if there were bloodstains present. There were
22 some bloodstain spatters, but not what I would have expected for a homicide involving a slashed
23 throat. I had a test run on the blood stains to determine whether the bloodstains were human or
24 canine, given the account by Rowan of the stabbing of Grendel. The results of those tests
25 showed that most of the blood stains were canine. However, there were bloodstains located by
26 the front door that were human. Those bloodstains were low velocity blood stains which would
27 indicate that the stains were the result of having a puncture wound and the blood dripping by
28 virtue of gravity. I then tested the DNA of the bloodstains located by Hyde's front door. The
29 DNA was found to be that of Lou Contralto.

30 Rowan explained the absence of the front foyer rug. He/she explained that the rug was
31 saturated with blood from the stabbing of Grendel, so Rowan rolled Grendel in the rug and
32 brought the dog to Rowan's place of business, where he/she buried Grendel. That location is
33 approximately four miles from Rowan's residence. Hyde stated that he/she discarded the rug in
34 a nearby landfill. We were never able to locate the rug.

35 Rowan provided complete access to the business property, and gave me permission to
36 exhume Grendel. Grendel was buried on the property just as Hyde had described. The business
37 is located on West 125th Street, four miles west of Crown Point, about half way between Crown
38 Point and Cedar Lake. Cedar Lake is about 8 miles west of Crown Point, or a 15-minute drive
39 from Contralto's home. Grendel was wrapped in a blanket and the dog's body had multiple
40 stabbing wounds. The DNA testing of tissue and blood in the dog's canines was a match for Lou
41 Contralto.

1 I examined all knives located at the Hyde residence. No blood stains were noted on the
2 knives. Contralto's alleged switchblade was never recovered. Based upon the length and depth
3 of the slash on Contralto's neck, I concluded, along with the coroner, that the blade/knife used to
4 cut Lou Contralto's throat was a large knife, such as a kitchen knife. I was unable to discern the
5 exact type of knife because of the changes in the body from the submersion and decomposition.
6 A variety of switchblades were tested to compare the type of cut to wounds located on the hands
7 and forearm of Lou Contralto. Those cuts appeared to be consistent with a smaller blade knife
8 used to stab the victim in the hands and arm. The evidence suggested that as Contralto and Hyde
9 fought, and during the struggle, the knife changed hands from Contralto to Hyde. Hyde is skilled
10 in martial arts and had proven his/her ability to disarm a knife from Contralto in the past. Then
11 Hyde used the weapon to stab Contralto in the hands and arm. Due to the decomposition of the
12 body and the sustained submersion in Cedar Lake, the cut wounds had become distorted and I
13 was unable to confirm a match with a switchblade similar to the knife carried by Lou Contralto.

14 Testing of trace evidence was also conducted. No trace evidence was located on clothing
15 of Rowan Hyde. Fiber analysis found in Hyde's vehicle confirmed that a rug had been placed in
16 the back of the SUV. There were no blood stains found in the vehicle. We were unable to obtain
17 trace evidence from the clothing of Lou Contralto's body and the rope due to the submersion in
18 the lake for several days. The rope was typical of rope one can locate at any hardware store and
19 did not assist in providing additional information for the investigation. We did not test for any
20 trace evidence in Rowan Hyde's row boat docked at Cedar Lake. Unfortunately, it was
21 something that was overlooked.

22 Based upon my training and experience as a Homicide Detective and Criminal Scene
23 Investigation technician, and based upon the findings of my investigation as well as the autopsy
24 report, it is my opinion that Rowan Hyde did cause the death of Lou Contralto by slashing his
25 neck on the evening of September 10th, 2016.

26 I have reviewed Dee Ennay's conclusions and note that his/her opinion was formed
27 without the benefit of examining the actual evidence or interviewing witnesses. Ennay only
28 reviewed the reports and the statements of the witnesses. By viewing the body in the context of
29 its surroundings, a detective or expert is better able to interpret certain findings at the autopsy.
30 Non-attendance at death scenes has been regarded as one of the classical mistakes in forensic
31 pathology.

32 *I affirm under penalty of perjury that the foregoing is true and correct to the best of my*
33 *belief and knowledge.*

34 Jerry Bilt
35 JERRY BILT

1 **Statement of Claire S. Day**

2 My name is Claire S. Day. I am 81 years old. When you're my age, people assume
3 you're weak: physically and mentally. I am here to tell you that I am in excellent health, and my
4 mind is as sharp as a tack. I have no limitations. My hearing is perfect, practically supersonic.
5 My eyesight has its wear and tear from old age, but with a pair of glasses or binoculars, I don't
6 miss a thing.

7 I am retired and live alone. I live in Hidden Links Estates, an established upscale
8 residential community on a golf course. I have lived in the same house in that neighborhood for
9 35 years, and I have lived in Crown Point all of my life. I live in the house directly across the
10 street from Rowan Hyde, about 80 feet. I have known Rowan Hyde from the day that he/she
11 purchased the house, about ten years ago. Rowan has been a good neighbor. He/She is quiet and
12 unassuming. Rowan isn't overly friendly, and keeps to himself/herself, but I have always found
13 him/her to be respectful of others.

14 I would describe Rowan Hyde as obsessive and compulsive. It seemed everything had to
15 be done a certain way, and everything had its place. If Rowan found anything out of place,
16 he/she fixed it immediately. Hyde is disciplined in everything he/she does – whether it is taking
17 care of his/her house or yard, or training his/her dog. For example, Rowan Hyde meticulously
18 groomed the hedges in his/her yard ever since he/she moved into the house ten years ago.
19 Rowan took pride in having the best looking lawn in the neighborhood. I've also noticed
20 Rowan's discipline when he/she practices that karate or Kung Fu stuff. I noticed when Rowan
21 Hyde practiced in his/her garage when the door was up. Each move was calculated and precise,
22 at least that's how it appeared to me. I'm no expert in that kind of stuff, but he/she looked very
23 skilled. For certain, Rowan is not a person who could be intimidated, and I believe could defend
24 himself/herself.

25 Rowan Hyde sells knives for a high-end cutlery company; you know, the kind of knife
26 you can spend \$200 to \$300 just for one knife. He/she demonstrates the knives all across the
27 United States, requiring him/her to be away from home for a couple of months at a time. Rowan
28 showed me his/her collection of knives once; it was quite impressive. He/she demonstrated them
29 for me. He/She was so nimble and skilled with a knife that he/she could look at me while at the
30 same time, at rapid speed, finely mince a carrot or garlic clove, and not skip a beat.

31 Rowan Hyde lives alone, except for his/her prized dog, Grendel. The dog is his/her only
32 family, and Rowan has a special bond with Grendel. He/She told me that he/she rescued the dog
33 when it was to be euthanized after attacking and biting a dog owner/handler at a dog show in
34 2011. I have observed that Rowan has great control and command over Grendel. Rowan is
35 dedicated to training Grendel. It is just one more example of his/her disciplined nature. I have
36 noticed that when Rowan is gone for any length of time, Grendel stays at the house alone.
37 Rowan Hyde does hire a dog sitter for prolonged absences. The sitter comes to the house 3 – 4
38 times a day for an hour or so each time. Unfortunately, Grendel barks during the day and
39 throughout the night when Rowan is gone for more than three days. Grendel is a pretty strong
40 dog, and weighs about 70-80 pounds. The sitter is unable to maintain good control of Grendel. I
41 also have noticed that the sitter is not as diligent as Rowan in taking care of Grendel's

1 excrement, which are quite messes. It seems that the Kings get the brunt of that problem because
2 they live right next door.

3 I live diagonally across the street from the Kings, or I guess their real names are the
4 Contraltos. There is not much going on in my neighborhood that I don't know about. I know the
5 history of all the people in the community. I have lots of time on my hands. So, I sit at my
6 window, and make it my business to watch people's comings and goings. I think other people's
7 lives are fascinating. I suppose it is a force of habit. My career, until I retired at 62, was in
8 anthropology, which is the study of humans, both past and present, and understanding of human
9 cultural behavior and socialization. I have a PhD. in Anthropology from Washington University
10 at St. Louis and my undergraduate from Northwestern University. I was a Professor of
11 Anthropology at Indiana University Northwest, and my fieldwork and research pertained to
12 Mound Builders. I have a few hobbies besides watching people. I enjoy birdwatching. I
13 invested in an expensive, but powerful set of binoculars - - the Oberwerk 25/40x100 mm Long
14 Range Observation Binocular. It is amazing the amount of detail I can see when I zoom in with
15 my binoculars. I also like to watch television shows about crime-solving like *48 Hours*, *Cold*
16 *Case Files*, *Forensic Files*, and *Disappeared*.

17 I have a reputation in our neighborhood for being a nosy, busybody. But in this case,
18 my keen observations helped solve this crime. The Kings' move to the Hidden Links
19 neighborhood was so bizarre, it caused quite a bit of gossip and speculation about these out-of-
20 town strangers. They bought the house with everything in it – not just your typical furniture and
21 appliances, but sheets, towels, plates, silverware, paintings, knickknacks – everything. There
22 was no moving van or even a pick-up truck with personal items brought to the house. They just
23 showed up one day and stepped in where the former owner (Grant Orr) had left off. Who does
24 that? Then they put out those plastic multi-colored chairs on the front lawn. It's like they
25 purposely were raising a bullseye target on their back. It was so curious and bizarre that I
26 thought I would watch them even more. Something was suspicious, but I had not figured out yet
27 what their story was. They would have made a great study for an anthropologist.

28 After Mr. King's death, I found out that the Kings were in the witness protection
29 program. I was surprised what little effort they had made to blend in to the community. The
30 Kings didn't fit into the neighborhood. They stood out, and the whole neighborhood was abuzz
31 about who these people were. You couldn't even go to the grocery store without hearing
32 someone talk about the strange new residents of Crown Point.

33 Mr. King dressed like he belonged on some disco floor with his unbuttoned silk shirt and
34 heavy gold chains. He even wore it to mow the lawn. He was an obnoxious sort of fellow. He
35 was full of himself, like he was somebody important, but he was so brash that he offended and
36 irritated nearly everyone in the neighborhood.

37 Mr. King's son/daughter, Jo, was unsociable. Jo stayed to himself/herself. The only one
38 Jo befriended was Rowan Hyde. It was an odd pairing, and I think that they both became friends
39 just to spite Mr. King. Jo even vandalized my house by spray painting my windows black. I had
40 to hire a professional window cleaner to restore them. Lou King paid for the damages. He took
41 out a roll of cash from his pocket. It had to be as big as two decks of cards, and it looked like it
42 was all \$100 bills. He asked me what was owed, then paid it, plus an extra \$300 "for my

1 trouble.” I’m not sure where all that money came from, because I know Lou owned that
2 business for pet fences, but I hardly ever saw him working at it. I even tried to refer jobs to him
3 for the business to help him out, but he frequently missed appointments. He also was unfriendly
4 to the customers’ pets, and he refused to help train.

5 The neighborhood, at one time, was quiet and peaceful. That all changed when the Kings
6 moved in. Lou and Jo King did not get along. They were constantly arguing. The fights
7 between Lou and Jo were loud and horrendous. I had never seen anything like it. They yelled at
8 each other the top of their lungs. They threw things against walls and at each other. I even heard
9 threats of violence towards each other. Jo King would yell to Mr. King “I hate you” or “I wish
10 you were dead.” Even from a distance, I could see that Jo’s body language was aggressive. I
11 never saw either of them make a move to physically harm each other. But you never know what
12 the tipping point will be. So, I took it upon myself to police their dysfunctional relationship. I
13 am the one who called the police to report the domestic disturbances involving the Kings. It
14 became so routine that I had the Lake County Sheriff’s Department on speed dial. Officer Jerry
15 Bilt was probably at their house 2 or 3 times a month. Each time, Officer Bilt calmed them
16 down, temporarily. Bilt told me that he/she didn’t take Jo’s threats too seriously because Jo was
17 just joking. Maybe it’s my old age, but that type of joke is lost on me. I think there was some
18 underlying fracture in their relationship from the past causing a strain in the present.

19 I also reported to the police other volatile situations involving Lou King. Those
20 confrontations were between Lou King and Rowan Hyde. They were at each other’s throats
21 frequently, and when they would go at it, neither would back down. The Kings moved into the
22 neighborhood in July, 2013 and it didn’t take long for the feud to begin. I think it all started
23 about a week after the Kings had moved in. I don’t know what Mr. King was thinking, but one
24 day, when Rowan was off at work Mr. King destroyed Rowan’s hedge. It turned into a further
25 catastrophe when he burned the brush pile, fueling the flames with gasoline. King must have
26 dumped several gallons of gasoline on the brush fire because I could see the flames were high
27 and the black smoke thick. I didn’t stop him, because I didn’t want to get involved. I thought
28 Mr. King might very well be crazy.

29 I was watching from my window when Rowan Hyde came home from work that day.
30 Rowan Hyde immediately saw the destruction to those hedges and the out-of-control burning
31 fire. He/She threw down a briefcase, and charged over to Mr. King. I opened my window so
32 that I could hear the argument clearly. Rowan Hyde was furious. His/Her face was beet red, and
33 he/she was pointing a finger at Mr. King and yelling obscenities. Mr. King yelled right back. He
34 took no responsibility for taking out the hedges. King said he didn’t care, that the hedges
35 blocked his view. Enraged, Rowan Hyde yelled “That’s the point. I don’t want to see your ugly
36 face, your pathetic clown suit, or the dog chain you’ve got around your neck.” Mr. King yelled
37 back “no one disrespects me like that and gets away with it.” It continued to get heated. Rowan
38 Hyde started threatening King. Rowan Hyde said “This is not the end of this. You’ll pay for
39 this, if it’s the last thing you do on this earth!” It appeared that it was only going to escalate from
40 there, so I went to call the police. I watched in fear when King then flipped open a switch blade
41 and thrust it within an arm’s length from Rowan Hyde’s throat. Rowan Hyde was not in the least
42 intimidated. He/She laughed, saying, “You call THAT a knife? I know knives, and I can take
43 you on, any place, anywhere.” King kept the knife pointed at Rowan Hyde for what seemed an
44 eternity, but was probably 2 minutes. King said menacingly, “Are you threatening me?” Then,

1 as cool as a cucumber, Rowan Hyde charged King and did some fancy-smancy Kung Fu or
2 Karate Kid move, dislodging the knife from Lou's grip and landing King flat on his back. In a
3 blink of an eye, King had picked up the knife from the ground and while he was still flat on the
4 ground, hurled the knife at Rowan. But Rowan, like someone from the Matrix, agilely dodged
5 the knife, almost as if it was in slow motion. Rowan then picked up the knife, pointed it at King,
6 and snarled through gritted teeth, "You've been warned." Then Rowan threw the blade sharply
7 toward the ground as if to stick the point further. I do not recall seeing Jo King present during
8 this argument, as I was focused on Lou King and Rowan Hyde. I also don't know when Officer
9 Bilt showed up during this heated battle.

10 Officer Jerry Bilt's presence relaxed tensions between the two. I told Officer Bilt the
11 events that had unfolded that day, just as I have stated here. To assuage my concerns, Officer
12 Bilt explained that he/she believed that he/she could encourage them to work out their
13 differences. Mr. King did bring out a wad of cash from his pocket, and threw some money to the
14 ground toward Rowan Hyde. I'm sure it was not enough to pay for all of the damages. Officer
15 Jerry Bilt intimated that he/she could get payment to Rowan Hyde for the damages. I don't
16 know if that ever happened, but I do know that this was not the last of the tumultuous battles
17 between the two neighbors.

18 Whether Mr. King was resentful for Rowan Hyde getting paid for the damages, or
19 because he had been embarrassed by Rowan Hyde's fortitude or mocking, it gave King all the
20 more reason to agitate Rowan Hyde. It started off slow - - little jabs here and there. And
21 fortunately, I suppose, Rowan Hyde had a job that required traveling sometimes months at a
22 time, so there were opportunities for cool down periods. However, as time passed, it was like a
23 storm that had been brewing. King used every trick in the playbook on how to torment your
24 neighbor. Mr. King knocked over trash cans in Rowan Hyde's driveway. He blasted heavy
25 metal rock music when Rowan Hyde was entertaining guests on his/her deck.

26 It was even intolerable for me across the street. At odd hours of the night, King would
27 rev up his car engine in the driveway, causing Rowan Hyde's dog to bark. The late evening
28 hours were not the only times that sleep was disrupted. Before the first ray of sun at dawn, King
29 had every possible noisy yard tool operating - - the lawn mower, the leaf blower, and the snow
30 blower. King intentionally blew leaves and snow into Hyde's yard and driveway. The constant
31 barrage of annoyances had to be stressful for Rowan Hyde.

32 About six months ago, I spoke with Rowan Hyde about the noises and problems with Mr.
33 King. I commiserated with him/her that Rowan's home was no longer a place of peace and
34 comfort. The police had been called to address the noise complaints and settle the disputes, but
35 it did little to help the situation. Rowan Hyde told me that he/she had filed a lawsuit for
36 nuisance, but that King didn't show up for court, and even with a court order against him, that
37 King had no intention of stopping the assaults. Rowan told me that it was clear that King had no
38 respect for authority, and in fact, turning to the law, only made matters worse. So, Rowan said
39 that he/she had planned to just ignore King and his petty antics. I was impressed with Rowan
40 Hyde's discipline to avoid stooping to King's childish level. Rowan Hyde told me that "when
41 they go low, you go high." I joked that if something happened to King, no jury in the world
42 would convict Rowan; that surely it would be justifiable homicide. We both chuckled.

1 It possibly could have stayed at that status quo, and who knows, maybe King would have
2 tired of harassing Rowan Hyde. The problem, however, was Rowan Hyde's dog, Grendel.
3 When Rowan was gone for his/her job, the dog was left alone most of the time. The dog had a
4 severe case of separation anxiety and barked incessantly, especially if Grendel heard any noises
5 coming from the King's house. Lou King would yell out his window for the dog to "shut up,"
6 which only stirred the dog up more. And then there were the times that the dog sitter let Grendel
7 go to the bathroom on the Kings' yard. I would see Lou out mowing the grass in his fine fancy
8 clothes, and then you'd hear him yell, "That stupid, no good dog. I'm going to kill him." And
9 Mr. King would take his shoes off, right then and there, and throw them in the garbage. You
10 could tell he was really angry.

11 When Rowan Hyde returned home, Mr. King would be extremely confrontational. Hyde
12 barely got out of his/her car, when Mr. King stomped over to the driveway. King complained
13 that the dog had gone to the bathroom in his yard and ruined his Italian shoes, or that the dog
14 barked and ruined his sleep. I overheard King tell Rowan Hyde that he was going to kill the dog,
15 and that there was nothing he/she could do about it. Hyde had reached his/her tipping point.
16 That dog was family to him/her. Threatening the dog was like threatening your child. I could
17 hear clear as day Rowan Hyde yell, while pointing a finger at Mr. King, "You touch one hair on
18 my dog, and I will make sure you don't live another day to tell about it."

19 The tensions continued to build and King became more menacing. Now it was not just
20 loud noises, or tipped garbage cans, but Rowan Hyde would come home to a broken window or a
21 car door keyed. Each time Officer Bilt was called to mitigate the feud, nothing would change.
22 There was no clear evidence that it was King, but we all knew it was. Officer Bilt reprimanded
23 King, but never arrested him. He/She told King that he was on thin ice, and Bilt could hit the
24 defrost button with no hesitation. Bilt said that it would only take one call and King would be
25 done . . . or was it gone? I could understand if Rowan Hyde was frustrated that the law seemed
26 to have no power over King. I approached Officer Jerry Bilt with concern that I feared their feud
27 would end tragically one day. Office Bilt reassured me that protections were in place to prevent
28 anything tragic.

29 A few weeks before King's death, I had a conversation with Rowan Hyde when we were
30 both working outside in our yards. Rowan told me that he/she had taken Grendel to the vet
31 because he/she was not eating or drinking water. After running some tests, Rowan learned that
32 Grendel had been given something poisonous. Rowan was convinced that King had made good
33 on his promise to kill Grendel, or at least make him very sick. I asked Rowan what he/she
34 planned to do. Rowan Hyde responded "There is only one way to take care of a bully and that is
35 to take them out." Rowan sounded cold and calculating. It actually scared me. I understood
36 Rowan's pain and frustration, but his/her statement confirmed my fear of a tragedy looming.

37 During that same time period, a few weeks before King's death, I observed strangers in
38 our neighborhood, which was quite unusual. The neighborhood is outside the town and not along
39 any main roads. We don't even get kids for Halloween because of the location. One night, I saw
40 a man parked down the street, just sitting in his car smoking. Using my high powered
41 binoculars, it looked to me as if he was watching the King's house. It was hard to see a lot of
42 detail at that distance and through the tinted car window. But, I noticed the wrist of his hand
43 hanging outside the window holding his cigarette. The wrist had the same type of gold clunky

1 chain like the one that Lou King wears. About a week later, I saw two shadows that dashed to
2 the back of King's house. It happened so fast that I did not have time to retrieve my binoculars.
3 I can't be sure if the shadows were people or the shadow from the trees. I can't recall the
4 specific date that I saw those shadows. It might have even been the night that King went
5 missing. I can't recall for certain. I didn't report my observations of the strangers to the police,
6 because I have a reputation for being overly suspicious besides being nosy. I didn't want to be
7 the one who cried wolf one too many times.

8 When I heard on the news that there had been a murder of Lou King, aka Lou Contralto, I
9 felt that I had relevant information. So I asked Officer Jerry Bilt to come to my house. I
10 reported to Officer Bilt what I saw on Saturday night, September 10, 2016. The night of
11 September 10th, I saw Lou King go to Rowan Hyde's house around 6 pm. Rowan opened the
12 door, and Grendel was right by his/her side. My windows were closed so I could not hear
13 anything. King pushed his way into the front foyer of the house. It looked like Grendel was
14 growling at King, but Rowan Hyde had Grendel under control. Then the door closed. I watched
15 the house for about 15 minutes because there were always fireworks between those two. I never
16 saw King leave.

17 That same night I woke up in the middle of the night restless; it was close to 2 am. I had
18 planned to read a book to help me sleep. So, I went to the front room to fetch my eyeglasses. I
19 was surprised to see Rowan Hyde coming out of his/her front foyer, dragging from the house a
20 rolled up area rug about the length of an adult body. The way he/she was pulling it, it looked
21 heavy. My gut feeling was that it was a body - - Lou's body rolled up in that rug. Rowan Hyde
22 may have seen me peering through the window, trying to make out what was going on. I did not
23 have the binoculars or my glasses. The next thing I know is that Hyde turned the outside lights
24 off to his/her house. Rowan had pulled out his/her Jeep Cherokee from the garage and opened
25 the back gate. He/She had backed in the vehicle, so the back of the vehicle was not in plain view
26 for me. What I could see was Rowan awkwardly picking up that rolled rug and putting it in the
27 back of the Cherokee. I observed Hyde put some other things in the back of the vehicle too.
28 However, with the lights off, it was hard to make out what the items were. The one thing I did
29 see was Rowan carrying a folded blanket and placing it in the front passenger seat. Hyde drove
30 away with the car lights off until he/she got to the end of the road. I started reading my book and
31 was still up when Hyde returned an hour and a half later. If you had spoken with Rowan Hyde
32 and had heard the iciness in his/her voice, and if you had observed that body in the rolled rug
33 being loaded and carried off in the middle of the night, you too would reach the same conclusion
34 as I have that Rowan Hyde is guilty of murdering Lou Contralto. I like Rowan Hyde and don't
35 want to believe it, but you can't refute the facts.

36 *I affirm under penalty of perjury that the foregoing is true and correct to the best of my*
37 *belief and knowledge.*

38 Claire S. Day
39 CLAIRE S. DAY

Statement of Rowan Hyde

My name is Rowan Hyde. I live in the Hidden Links Estates community in Crown Point. I purchased my home about ten years ago. I grew up just outside of Houston, Texas and attended college there as well. My career brought me to Crown Point, and I have embraced it as my home. It has a hometown atmosphere with a historic downtown square, yet it is in close proximity to Chicago and Lake Michigan beaches. I like the Hidden Links neighborhood too; it is quiet and peaceful. The neighborhood has beautiful, upscale homes on a golf course. An aspect of the neighborhood that I enjoy is that the community shares a common sense of pride in the upkeep and appearance of their homes and landscape. I like to think that the neighbors appreciate that I am meticulous about keeping my house well maintained and the landscape nicely groomed. When the Kings moved in the neighborhood, our quiet, peaceful slice of heaven forever changed.

I attended Conrad N. Hilton College at the University of Houston and obtained a Bachelor of Science degree in 2004 in Hotel and Restaurant Management. I then came to the Midwest and attended Purdue University to pursue a Masters in Hospitality and Tourism Management. While attending Purdue, I picked up a job with SharpCo. selling cutlery to friends, families and acquaintances. SharpCo has the sales representative (me) present the products at the customers home. I practiced my knife skills day-in and day-out so that my presentations of the knives were flawless and enticed customers to purchase the products. As quirky as it may sound, I found knives to be my passion. I was fascinated in the art and science of forging a high quality knife. It also was lucrative, but didn't have the unreasonable demands on my time like most careers in the hospitality business.

I decided not to complete my Masters at Purdue, but rather put my passion and knife skills to work as an entrepreneur. I partnered with two Purdue graduates – one with a Masters in Materials Engineering and the other in Industrial Design. With my knowledge of knife construction and functionality, we were able to create artisan knives forged from one piece of our trade secret specially tempered high carbon stainless steel to provide the perfect balance of toughness, rust resistance and edge retention. We formed a knife company, located in Crown Point, called The Cutting Edge. The Company has become very successful, and our knives have been endorsed by premier chefs throughout the world. As a company representative, I make presentations at cooking schools, gourmet cooking stores, high-end department stores, and upscale restaurants throughout the country to demonstrate the quality of the knives. I schedule presentations for ten to twelve different locations in a particular region of the country for a one-month period, generally. So, I am sometimes gone for a month at a time. Naturally, I have a large collection of knives in my home, which I always keep razor sharp, not for any nefarious reason, but rather because it is my career.

When I'm not working, I am pursuing one of my other hobbies and interests. One of my passions is martial arts. I became interested in martial arts as a child because I was bullied. My interest in learning martial arts skills was to be able to defend myself. But, as I learned more about martial arts, I learned that the teachings are about discipline, confidence, and focus, it is not about fighting. I have continued with the teachings of Martial Arts since learning it as a child, and I am now a black belt. I compete in Martial Arts competitions, schedule permitting. For the past year, I have been working with nunchaku. It is a training weapon that develops

1 quicker hand movements. I believe martial arts has made me powerful and strong. I practice the
2 skills regularly. It helps me focus, and reminds me to center my life whenever I feel it is
3 spinning out of control. I help teach at the Martial Arts Discipline (MAD) School when needed,
4 if I am in the area. I enjoy working with students to develop confidence, focus, and discipline.

5 Another one of my passions is working with pets, particularly dogs. I volunteer at the
6 local Humane Society. Dogs offer you unconditional love and trust. A dog provides
7 companionship and helps reduce stress, and helps us relax and focus our attention away from
8 problems and worries. In a shelter, there are so many dogs that still trust and love, even though
9 they have been abandoned or abused. I like working with the pets at the shelter because they just
10 need a little kindness. I felt like Jo King was like that when I met him/her. He/she was assigned
11 to the shelter to fulfill his/her community service. We worked together at the shelter and became
12 friends.

13 I rescued my dog, Grendel. He is a Chow Chow. Chow Chows are powerfully built.
14 The breed standard is 17 to 20 inches in height, and they usually weigh between 55 and 70
15 pounds. Grendel is at the high end of the standard at 20 inches in height and a weight of 80
16 pounds. The Chow Chow breed is fearless, intelligent, and suspicious of strangers. However,
17 they need proper socialization. Because of their nature, it takes a firm hand to control them.

18 Grendel was not your typical rescue, because he actually is a full pedigree Champion
19 Chow Chow. Grendel won several awards in his class, in his group, and even was named Best of
20 Breed. Unfortunately, Grendel had been over-trained and became annoyed by certain sounds.
21 Grendel developed some bad behaviors, specifically biting and some aggressive behavior. When
22 he appeared at the Donnybrook Dog Show at the Fort Wayne Coliseum, in November, 2011, he
23 bit another dog owner/trainer. Grendel's owner, a rich tycoon, was sued because he allegedly
24 knew that Grendel had a propensity to be vicious. A judgment was entered against him, and he
25 had to pay substantial sums of money. Thereafter, he had planned to have Grendel euthanized to
26 be rid of the problem. I learned about the plan to end Grendel's life, and I convinced him to let
27 me keep Grendel. Grendel and I have been bonded since that day, April 4, 2013.

28 I adopted Grendel only three months prior to when the Kings moved into the house next
29 door to me. The Kings moved into the house on July 1, 2013. I had been working with re-
30 training Grendel and had noticed positive changes. Grendel had become, within a short time,
31 loyal and obedient. However, Grendel had not yet fully adapted to his new environment.
32 Grendel's sensitivity and irritation to loud noises were a bad combination with the boisterous and
33 raucous Kings. Chaos ensued. Grendel sensed hostile behavior from Mr. King toward me, and
34 likewise was protective and border-line aggressive. I was able to keep Grendel under control,
35 but he needed more training.

36 Unfortunately, Grendel had to be placed in the care of others at times. I had
37 commitments for scheduled presentations for Cutting Edge that could not be canceled. I owed it
38 to my business partners to ensure the company's success. When I was away from home, whether
39 it was for work or martial arts competitions, I hired a dog sitter to take care of Grendel in my
40 home. The sitters, all of whom I vetted, had experience with training large breed dogs. The
41 sitters' duties were to walk, feed, and play with Grendel five times a day. None of the sitters
42 ever reported any problems with Grendel. None of the neighbors, except Lou King, complained

1 about Grendel. Even Jo King told me that Grendel wasn't the problem, and I wasn't the
2 problem. The problem, according to Jo, was his/her Dad. The problems between Mr. King and I
3 concerning Grendel began after King tried to sell me a No Escape Fence. It seemed he took it
4 personally when I said I wasn't interested. If a dog is properly trained, there is no need for such
5 devices.

6 The conflict between Mr. King and I started even before there was an issue with Grendel.
7 The battle lines were drawn over shrubbery. I had a beautiful privacy hedge that I planted and
8 groomed for ten years. The hedge was dense and about 5 feet tall and 20 feet long. It was
9 located completely on my property, situated in between King's driveway and my driveway. Only
10 seven days after the Kings moved in, I was shocked when I came home to see the entire privacy
11 hedge yanked out of the ground with some scrappy stumps left behind, and, in the backyard was
12 a large fire causing heavy smoke. Naturally, I was upset, actually furious. I jumped out of my
13 car and immediately started yelling at Mr. King who was standing in his driveway. I said, "What
14 do you think you're doing, man?" That's my property. Those are my bushes that you've
15 destroyed." He shrugged his shoulders, and said "So?" His answer was flippant, like he didn't
16 care. I said, "So? So, I've been grooming those hedges for ten years." Then he said, "Well, I
17 did you a favor." Then he said, as if it justified his actions, "The hedge blocked my view." His
18 attitude brought out my worst, and I'm not proud of how I reacted. I told him, "That's the point -
19 - so I don't have to see your ridiculous clown suit or your choke chain dog collar." I said he was
20 "crazy," "a lunatic," a "nut job." I made fun of his multi-colored plastic chairs that he so
21 prominently placed in his front yard, and said he didn't belong in our neighborhood. I told him
22 to "go back to whatever hole [he] crawled out of."

23 I then saw that the once-beautiful shrubs were smoldering in the back yard from a fire
24 spread across our two properties. The fire scorched a 5 x 10 ft. section of my yard. I also saw
25 that there was thick black smoke wafting through the open windows of my house. The argument
26 got more heated; our voices were louder and louder. Fuming with anger, I fired off one insult
27 after another. He pointed his finger at me and said "You disrespected me. No one disrespects
28 Lucky Lou and gets away with it." He sounded like he was right out of *Good Fellas* or
29 something. I laughed, and said "Who?" That didn't go over so well. He called me more names,
30 yelled obscenities, and threatened me. I yelled, "This is not the end of this." I told him that I
31 could take him to court and said, "You will pay for this." He threatened me, saying, "I can take
32 you out, if I want." I was not intimidated. I had dealt with bullies before in my life. I said "Are
33 you threatening me?"

34 Mr. King, I mean Mr. Contralto, then pulled a switch blade out of his pocket and flashed
35 it toward me. He started walking toward me with the blade held out in front like he meant to do
36 me harm. As he was charging me, I used a defensive martial arts move, knocking the knife out
37 of his hand to disarm him, and he fell to the ground. While he was lying on the ground, he
38 grabbed the knife and quickly hurled it toward me. I swerved and jumped, and the knife missed
39 me. It landed on the ground next to me. I picked up the knife and told him that knives were my
40 business and not to mess with me. I dropped the knife to the ground and walked away.

41 Officer Bilt showed up sometime during the argument. I would not say he/she diffused
42 the situation, as I had already walked away. Officer Bilt saw me with the knife or heard some of
43 the words I said, and presumed I was the aggressor. I had no intention of injuring or harming

1 Contralto. I used defensive moves only, and I stood up to a bully. Officer Jerry Bilt told me to
2 go to court to settle the matter. I never filed suit. I decided to let bygones be bygones. I am
3 embarrassed by that whole situation. I regret that I lost my cool. Normally, I am a disciplined
4 person. It's part of my martial arts training. Thereafter, I resolved to handle future situations
5 involving Contralto calmly, with decency, and to look for common ground and resolutions.

6 Mr. Contralto complained constantly about my dog, whether it was barking, peeing on his
7 tree, mailbox or flag pole, wanting me to walk the dog on the sidewalk across the street if he was
8 in his front yard, and heaven forbid if Grendel chased a squirrel on to his yard. He was always
9 yelling at me or my dog. Grendel, at times, would lunge toward him, but I always was able to
10 keep Grendel under control. King also accused me of having my dog relieve himself in his yard,
11 but I had nothing to do with that. I can't control the dog sitters when I'm not around. If I
12 became aware that one of the dog sitters wasn't respecting his property, or any property for that
13 matter, I would instruct the agency to not have that dog sitter return.

14 Contralto was a bully, and I was his punching bag. He blasted music when I would have
15 guests at my home. He intentionally ran his lawn mower, leaf blower, and snow blower in the
16 wee hours to disturb my sleep. He shone security lights through my window. There were other
17 things that happened that I couldn't prove he was the culprit, but my gut knew it was him. I had
18 a garbage can knocked over, a window broken, and my car keyed. In spite of it all, I stayed
19 cordial. I couldn't completely ignore his verbal abuse and harassment. I reported him to the
20 police frequently, but nothing ever seemed to come of that. I also filed a lawsuit against him for
21 nuisance. He never showed up in court, and did not pay the judgment against him. He had little,
22 if any, respect for the law or authorities.

23 On the night of Saturday, September 10, 2016, Lou came over to my house. I believe it
24 was around 7 pm. It was a complete surprise. I had not heard a voicemail message from Lou
25 prior to him pounding on my front door. When I opened the door, Lou barged into the front
26 foyer. He had taken out his switchblade and said he didn't want any trouble, but that he was
27 taking Grendel. We argued, and I told him that until he had legal papers to take Grendel, my dog
28 would stay with me. Grendel was by my side.

29 King lunged toward Grendel with the knife in hand, and Grendel defensively attacked
30 him. Grendel bit King several times while King was flailing his knife around recklessly. I tried
31 to step into the fray to separate King and Grendel to calm things down. It was chaotic and there
32 was too much commotion for me to use any of my training in martial arts to disarm King.
33 King's switchblade was thrashing in every direction and as Grendel attacked and defended, I'm
34 certain King got cut with his own knife a few times. I was yelling "STOP! STOP." Grendel was
35 the only family I had.

36 Grendel then collapsed, and I kneeled, leaned over him, and held him. He had been
37 stabbed multiple times. He gasped his last breaths and his eyes pierced my soul. And then he
38 was gone, his lifeless limp body resting on the rug in the front foyer where it all began only a
39 few minutes prior. As I was leaning over Grendel's body, I looked up at Lou Contralto and told
40 him that he would be arrested for animal cruelty. I said I was calling the police immediately. I
41 told him that, even if he wasn't convicted in a court of law, he would be convicted in the court of

1 public opinion. I vowed to tell every media outlet what he had done. King/Contralto looked
2 shaken. He left my house saying he was going home, and that's the last I saw of him.

3 I ultimately did not call police after King killed Grendel. From past experience, it
4 appeared that King was protected. The law wasn't going to charge him with any crimes, and
5 even if a judgement was entered against him, he would never pay a dime. I also didn't smear
6 King in the media. It wasn't going to bring Grendel back, and the grief gripped me so deeply, I
7 didn't think I could hear the tragedy play over and over again.

8 The night Grendel died, I was in a state of shock - - numb. I was grief-stricken. I cried
9 for several hours straight. Grendel was my family. We had bonded in the few years I had him.
10 King had not given Grendel any peace. I wanted to put him to rest in a place where he would
11 find peace. The Company had its manufacturing facility out in the country about four miles west
12 of town, about halfway between Crown Point and Cedar Lake. I decided to bury Grendel there.
13 So, I rolled Grendel up in the front foyer rug, which was saturated with his blood from being
14 stabbed so many times. His dead weight was very heavy, so I pulled Grendel inside the rug out
15 the front door to my Lexus RX. I thought I saw Claire Day watching from his/her window and I
16 didn't want to have to share my grief at that moment or anytime soon with anyone. So, I turned
17 off my outside lights. I grabbed a few things I would need - - a shovel, a flashlight, Grendel's
18 favorite blanket and toy, plus a rope to secure his body in his blanket. When I left the house, I
19 also turned off the headlights for my car. It was very late at night - maybe around 2 am or so,
20 and out of respect for others, I didn't want to disturb anyone with my headlights shining into
21 their homes. Funny how you can try to do something nice, and because people are cynical they
22 think there is something suspicious about it.

23 I went to the Company's land and found a nice spot under a tree to bury Grendel. I dug a
24 deep hole so that wild animals wouldn't dig him up. I placed his body in the blanket that I
25 brought and tied him up with a rope and then rolled his body into the grave. I said a silent
26 prayer. I asked that I be able to forgive King, in time. Then, I sat there on the ground for a long
27 time, wishing all of this was just a bad dream. Before returning home, I drove by the landfill and
28 dropped off the bloody foyer rug. There was no reason to keep it. It was just a bad reminder of
29 the loss of my Grendel. I arrived back home in about an hour.

30 Jo King came to my house on Sunday evening. I was surprised to see him/her, but
31 thought maybe Lou had told Jo about killing Grendel. I realized too, at that time, that I had not
32 called Jo or Lou to see if Lou was okay after receiving the dog bites. I suppose subconsciously, I
33 was angry that Lou had killed my dog viciously, and I didn't have it in me to extend common
34 courtesies. Also, I was stricken with grief.

35 Jo asked me if I knew where his/her Dad was. He/She asked me if Lou had come to my
36 house on Saturday night. I explained to Jo what had happened - Lou's aggression and attack
37 against Grendel, and Grendel trying to defend himself and me. It was very difficult for me to
38 discuss Grendel's death. Jo asked me what happened to my foyer rug, and I explained that
39 Grendel suffered numerous deep cuts, and that I had to throw the rug away the night before
40 because it was saturated with blood. When Jo pressed me further about the whereabouts of
41 his/her father, I said, "I hope he's found. I'm sure he'll be home soon." I apologized that I had
42 not called Jo or Lou to see if the puncture wounds from Grendel were okay.

1 Jo also asked me a curious question about whether I had seen any strangers in the
2 neighborhood. To be quite honest, I have been gone quite a bit giving knife presentations that I
3 feel like I have not been home long enough to notice much. I couldn't think of anything at the
4 time, but now that I've thought about it, and trying to put the pieces together, I do remember one
5 instance. I was walking Grendel on the sidewalk past King's house and this stranger, drove by
6 slowly in a black sedan. He was wearing dark sunglasses and a silk shirt like the type Mr. King
7 wore. This guy rolls down his window and asks me if that's where Lucky Lou lives. I shook my
8 head no, and said Lou King lived in that house. After he left, I remembered that Mr. King once
9 referred to himself as Lucky Lou. That happened about two weeks prior to Mr. King's
10 disappearance.

11 It is my understanding that Lou King's body surfaced at Cedar Lake on Wednesday,
12 September 14th. He had been murdered. Detective Jerry Bilt had learned from Jo King about
13 my last encounter with Lou and the fight that had ensued with Lou stabbing Grendel to death.
14 Detective Bilt informed me that when they located King/Contralto's body, no switchblade was
15 located on him. Detective Bilt asked me if I knew what happened to it, as I was the last person
16 who had seen him with that knife. Quite honestly, I had no explanation. It was not left at my
17 house. Maybe King dumped it because I threatened to go to the police about him killing my dog.
18 Detective Bilt also asked me about my owning a boat. As I told him/her, I do own a small
19 rowboat that I have docked at Cedar Lake. I think every person in our neighborhood has a boat
20 docked on that lake.

21 I have to believe that I am the scapegoat for the death of Lou Contralto aka Lou King.
22 The United States Marshal Service wants to protect their statistics of never having a protected
23 witness murdered on their watch. I've heard it said that every defendant says they're innocent.
24 But you have to believe me, I AM innocent!

25 *I affirm under penalty of perjury that the foregoing is true and correct to the best of my*
26 *belief and knowledge.*

27 Rowan Hyde
28 ROWAN HYDE

1 **Statement of Ricci Contralto**

2 My real name is Ricci Contralto. For the past eight years, I was in the witness protection
3 program. I've been a chameleon, changing my appearance and who I am to disguise myself
4 from dangerous people. I am not the poster child for the witness protection program. I hated it.
5 The deaths of my parents marked the beginning and end of my time in the witness protection
6 program. I no longer have a family support system. I have been cut off from the family I knew
7 for 8 years. No one from my old life knows me anymore. I don't even know who I am.
8 Sometimes I don't even know my real name.

9 I grew up in Chicago until I was nine years old. We lived within a few blocks of most of
10 my extended family. My friends lived within a two-block radius. I enjoyed sports, and was even
11 pretty good at it. I was also good at school, back then. I laughed. I played. I had no cares in the
12 world. I was somebody. My dad, Lou, was an important man in our neighborhood. He was part
13 of Tony Tessitura's crew. We walked through the neighborhood and people recognized us as
14 someone important, because Dad was part of Tony's guys, you know? People gave him respect.
15 We didn't have to have reservations for restaurants because Dad was one of Tony's guys. At the
16 neighborhood gelato shop, I was "Lou's kid," and so I didn't have to pay for my gelato.

17 I really never knew what my Dad did for a living. Sometimes he came home with bloody
18 knuckles and he would say it was a hard day at work. He always had a huge roll of cash in his
19 pocket, bound with a rubber band. In Chicago, we only used cash. None of Tony's guys had a
20 checking or savings accounts in a bank. Dad always dressed real nice too – silk suits and gold
21 jewelry. He drove a shiny black Cadillac Escalade.

22 When I was nine, my life changed. I have bits and pieces of memories from the day we
23 left Chicago and never returned. I remember Dad seemed a bit nervous that day and took out a
24 strongbox from under a floorboard in our hall closet. The next thing I remember was that I was
25 walking home from school in the rain. A dark van pulled up and my Dad was inside and there
26 were others in the van yelling at me. Everyone kept telling me, "hurry, hurry, hurry." I
27 remember stopping and switching vans a little later, and Dad was upset about the defrost. My
28 Dad told me that my mom had been murdered by one of Tony's guys, and that it was all his fault.
29 I think I passed out then because I don't remember anything until I woke up in a motel. That
30 was my introduction to the federal Witness Security Program, or "witness protection."

31 Dad never explained to me what he did, even after we entered witness protection. He just
32 told me that I needed to always look over my shoulder, and watch for anyone who acts
33 suspicious, because there were bad guys who wanted to kill us, like they killed my mother. He
34 said that they would never give up on hunting us down. I barely spoke to him for a long, long
35 time. All I could think was that it was unforgivable that my Dad was responsible for getting my
36 Mom killed and for getting us into this mess.

37 Marshal Teed sat down with me and told me that he/she was our key to survival: that
38 he/she would protect us. Yeah, right. Look how well that turned out. Marshal Teed said we
39 could never go back to Chicago or our old way of life. He/she said we would be killed if we
40 went back. The Marshal said that the word on the street was that Tony Tessitura had a contract
41 out on my Dad. Can you imagine what it feels like to know there is someone out there who

1 wants to kill you? The Marshal told us to start thinking of new names - - names that we would
2 remember. He/she told us not to tell anyone our new names.

3 We stayed in cheap motels for a long time. We moved around from motel to motel,
4 never staying long in one place. Marshal Teed told us that we had to stay in the motels under
5 full protection for our safety until after the trials of Tony's guys. The TV became my only
6 friend. I wasn't even allowed to go to school that first year.

7 After the trials were over, Marshal Teed explained that we would be relocated to a new
8 city. We changed names again and pretended to be someone else. We had to be relocated
9 several times – so many times, I lost count. It is all a blur. With each new relocation, Marshal
10 Teed explained that he/she received a tip that Tony's crew was closing in on our new location
11 and identities and we had to move to be safe. Tony's hitman was always one step behind us,
12 relentless in his pursuit of us. It was just a matter of time before the Mafia would find us.

13 We would get a packet of things to memorize before each relocation. Again and again,
14 we would practice saying and writing our new names. Dad and I used to joke that we had to keep
15 our driver's licenses on us always because we might forget the current names assigned to us. We
16 laughed, but it was true. We had to study information about the town where we would be
17 relocated next. We also had a set of facts to memorize about our new identities – a brief history
18 of some fake place where we supposedly had moved from, and a little story to go with it. It was
19 never enough to answer questions that we would be asked. We would have to fill in the gaps
20 with plausible lies. We also became experts in the art of avoiding questions and changing
21 subjects. I learned not to make eye contact or strike up conversations with random people,
22 because it could attract attention or invite awkward questions. You don't realize how much you
23 talk about yourself and your past until you don't have one.

24 I lived every day as a lie. But, lying didn't come easy for me. I felt sure people would
25 know I was lying. Innocent things would throw me off, like questions about old friends. When
26 anyone would ask me questions about where I was from or something personal, I would freeze
27 and not know what to say. One of the worst parts of hiding was lying. You're forced to lie, and
28 you feel ashamed. You are not a criminal, but you are treated like one, and made to act like one.

29 I had a difficult childhood trying to figure out who I was. In our new locations, we were
30 nobodies. Even worse, we were nobodies with empty souls. Everything about us was stashed
31 away in some little box. You are forced to give up your past and your memories of your past.
32 But everything you are as a person is based on where you came from and the people who loved
33 you. I went to school in an alien place as a different person, not who I was. The Witness
34 Protection Program may have saved my physical being, but it destroyed my sense of self. The
35 Mafia's deadly grip forever changed my life.

36 Moving around so often, and reinventing myself each time, took its toll on me. I became
37 a poor student because I just didn't care. It didn't matter. More than likely I would be in a new
38 school system the following year. I stopped being involved in sports or clubs, because I never
39 knew when the next move would be forced on me. I became a social hermit. I spent time by
40 myself reading books. It was hard making friends. Sometimes I thought "what's the point, I'll

1 only be moving again so why invest the energy into a friendship.” I never stayed in a place long
2 enough to create any memories.

3 We lived in six places over a period of eight years. The longest time we stayed in any
4 one location was for three years. It was our last move - - Crown Point, Indiana. Maybe we
5 stayed too long there and gave Tony’s crew more time to find us. The reason for every
6 relocation was because there was a chance that Tony had found us. Once we ran into a person
7 from our past on a vacation. As soon as we were spotted, we were uprooted in an instant and
8 moved to another “safe” location. Another time, we moved because a couple of years had passed
9 and I was missing my relatives – something familiar, something real. I thought it was okay to let
10 my Aunt Bonnie and my Uncle Clyde know that we were in Miami. I knew they would never
11 tell anyone. They were not caught up in anything to do with my Dad’s business with Tony.
12 They lived in Atlanta, Georgia, far away from anyone connected to Tony’s guys. But, it doesn’t
13 take long for the bad guys to find out. It ain’t a secret if you tell somebody.

14 In our last relocation, I was Jo King. My Dad assumed the name of Lou King. We were
15 placed in Crown Point, Indiana with our fake names, fake backgrounds, and fake personas.
16 Crown Point was the first relocation where we did not live in a big city. What an odd place to
17 hide us. Crown Point made its place in history with another criminal – John Dillinger. It was
18 like a bad omen. But of greater concern, was that we were an hour’s drive to Chicago, and that
19 much closer to Tony’s crew.

20 It seemed like we were breaking all of the rules and safe practices once we moved to
21 Crown Point. Our home looked rich and was in a very nice neighborhood. But, you don’t want
22 to be in a nice neighborhood, because those people are all in your business and want to know
23 everything about you. You want to live on the fringe of society and be forgettable. We were
24 anything but forgettable in that town. Dad, a city guy all of his life, had a different concept for
25 what to do with our first-ever front lawn. When Dad put four brightly colored plastic
26 Adirondack chairs from Big Lots in the front lawn, we became the talk of the neighborhood.

27 Dad had become more lax in taking precautions to avoid detection. I don’t think Marshal
28 Teed knew or cared that Dad wasn’t taking the necessary precautions to go unnoticed. Multiple
29 relocation experiences had made us feel comfortable. Feeling comfortable is bad. You forget
30 that you are still being hunted. Most mistakes are made when you think no one is watching.
31 Someone is always watching. You shouldn’t do anything to attract attention. It’s like putting a
32 target on your back.

33 In Crown Point, Dad stuck out like a sore thumb. He wore thick gold chains, and silk
34 shirts with the shirt half unbuttoned. It wasn’t the sort of look of a typical Crown Point resident.
35 Dad had also started flashing his roll of money. He even purchased a black Cadillac Escalade. I
36 don’t know how Dad could afford the Escalade. The government had taken away our subsidy.
37 Dad’s new employment was as the owner and sales person for a franchise of underground
38 electric fences for pets, called No Escape. What kind of irony is that? Dad was upset when the
39 government told him this was his new line of work. Dad complained to Marshal Teed that he
40 couldn’t make money in that line of work. Dad was not a good salesman for No Escape. I
41 overheard Dad say to Marshal Teed that no one asked Dad for his input. He was just thrown into
42 some random work, and expected to make it work. Funny thing was that Dad is one of those

1 people that loathe dogs. He would go to an appointment for the business, and the customer
2 would expect him to warm up to their dog, but instead he recoiled.

3 We were no longer Marshal Teed's priority. He/she told us in 2010 that he/she was being
4 transferred to Brooklyn, New York to work on some "big," high profile cases. Marshal Teed
5 became less involved with our needs and our safety. I made several calls to Marshal Teed after
6 we moved to Crown Point. Teed did not make any phone calls to us, unless he/she was returning
7 one of our calls. Even then, a phone call might not be returned by Marshal Teed for a few days
8 later. Marshal Teed did not personally see to our safety anymore. If either Dad or I reported
9 something suspicious, Marshal Teed would just contact the local police and ask them to drop in
10 on us and make sure we were doing okay.

11 With less protection from the U.S. Marshal Service, I stayed alert for anything
12 suspicious. I realize that I was a little jumpy: like the time that I thought I heard a gunshot over
13 the 4th of July. Officer Jerry Bilt came to investigate and figured out it was just some lame
14 fireworks. I know that sometimes the line between caution and paranoia was easy to blur. But, I
15 also know what I saw. A couple of weeks before Dad was murdered, there were three suspicious
16 instances that raised the hair on my neck. Bad luck comes in threes. First, I thought I saw one of
17 Tony's guys walking in front of Dad's business. Another time, I saw a car parked outside the
18 house, with two men sitting in the car, facing toward our house. I noticed there was a pile of
19 cigarette butts on the ground just outside the front door of the car. And last, I saw a guy standing
20 on the corner across from my school's parking lot. He had one of those knives that you can flip
21 open with a flick of your wrist, and he flipped it open and shut several times. When I made eye
22 contact with him, he turned around and walked away. I knew we had been marked. You don't
23 spend eight years of your life looking over your shoulder for the bad guys, and not know what
24 looks out of place. My suspicions proved to be right. I know that my Dad was murdered by the
25 Tessitura family.

26 I did not tell my Dad about seeing Tony's guys. There was a part of me that thought he
27 might just confront them, and then they'd have no choice but to kill him and I'd lose him forever.
28 Instead, I called Marshal Teed after each of those suspicious events. I told him/her that I was
29 worried that the death knell had rung. Each time I called with one of my observations of
30 suspicious events, Marshal Teed reminded me of how I had overreacted to the fireworks over
31 July 4th. Marshal Teed told me that it was just my imagination. Marshal Teed said there was no
32 chatter that we had been found by the Mafia or that the hitman was close on our trail. The
33 Marshal offered to send Officer Jerry Bilt to investigate, but of course, the suspicious characters
34 were not hanging around 24/7. Officer Bilt never investigated as far as I know. I begged
35 Marshal Teed to relocate us. I hated the thought of another relocation, but it was better than the
36 alternative. It seemed like my complaints were a bother for Marshal Teed. I think that Marshal
37 Teed's idea from the start of our relocation to Crown Point was that it was hopefully our last.
38 We had never been placed in such a nice home, with plush furnishings. Dad had never been set
39 up with his/her own business in any of our previous relocations. Marshal Teed let us be close to
40 our roots and even let Dad keep his real first name.

41 I admit that when we were relocated to Crown Point, I was angry. I was tired of moving.
42 I became even more despondent. I resented my Dad for putting me in this position. I was very
43 bitter about being in witness protection. And I resented the U.S. Marshal Service. My life was

1 in their total control – where I lived, who I could talk to, what I could say or not say. This was
2 their fault too. The isolation was beginning to take its toll.

3 I would have heated arguments with Dad about this being his fault. I would yell at Dad
4 that I hated looking over my shoulder for Tony’s hitman. The arguments were loud – that’s the
5 way our family and the people from our past argued. It’s boisterous. It’s animated. It’s putting
6 it all out on the table. I’m certain our arguments raised eyebrows with our neighbors. The police
7 were called to house several times when Dad and I were arguing. I’m sure the police visits for
8 domestic disturbances were called in by our neighbor across the street, Ms./Mr. Claire Day. It is
9 very possible someone heard those arguments, and it got back to one of Tony’s guys.

10 The frustrations, worries, and hate kept building inside me. And, I acted out – badly. I
11 had some trouble with the law. In 2015, when I was 16, I was arrested for criminal mischief and
12 criminal trespass. I noticed that our neighbor that lived across the street, Mr./Ms. Claire Day,
13 was always peering out the window watching our every move. It was unnerving. There was also
14 a part of me that became suspicious that Claire Day may have been paid off by the Mafia to spy
15 on us. So, I broke into Claire Day’s house and used black spray paint to cover the window
16 he/she used to peer at us. I pled guilty to the criminal mischief. What did I care about a criminal
17 record under some fake name and fake social security number? Through the plea agreement, the
18 criminal trespass charge was dismissed. I pled guilty because I didn’t want to raise any flags to
19 Tony’s crew if I had to explain why it hit a nerve about someone peering at you from across the
20 street. As part of my plea deal, I did not have to serve any jail time. Dad paid the fine, and I did
21 some community service work at the local Humane Society.

22 It was through my work at the Humane Society that I got to know Rowan Hyde. We
23 were neighbors but had not talked to each other much as neighbors. Just an occasional nod or a
24 short “hello.” Rowan Hyde volunteered at the shelter, and we learned that we shared the same
25 interest and enjoyment of dogs. We worked together at the shelter walking the dogs, giving them
26 baths, and feeding them. I know that Rowan and my Dad couldn’t stand each other - - they both
27 told me so - - but I know that Rowan couldn’t have murdered my Dad. It had to be the Mafia.
28 Rowan is friendly, and not some hot-head. I don’t believe he/she could ever kill my Dad. Sure
29 they had words, but that was all it was: words. Threats don’t mean anything unless you act on
30 it.

31 From the get-go, Dad and Rowan Hyde were like the feuding Hatfields and the McCoys.
32 We moved to our new home in Crown Point in July, 2013. Rowan Hyde lived in the house next
33 door. Dad didn’t know anything about lawn care, or living in a nice upscale neighborhood like
34 that. Within days after we moved, Dad said he didn’t like the hedge between our house and
35 Rowan’s house. He thought it was too tall and dense. He didn’t want one of Tony’s crew to use
36 it to ambush us. His solution was to yank it all out.

37 When Rowan returned home that day and saw the hedge destroyed, he/she was livid.
38 Apparently, it was Rowan’s hedge. It was all a misunderstanding, but it definitely got things off
39 to a bad start. To make matters worse, Dad torched the scrapped bushes in the back yard next to
40 Rowan Hyde’s property. Dousing the brush pile with gasoline, the flames reached upward to the
41 leaves of the surrounding trees. The fire burned out of control, scorching part of Rowan Hyde’s

1 yard. Oh, and that's not all. Just so happens that on that very day, Rowan Hyde left his/her
2 windows open and his/her house filled with smoke.

3 Rowan Hyde screamed at Dad, yelling derogatory and demeaning insults. Dad was
4 unapologetic which escalated the matter. Dad was not used to such treatment and yelled back at
5 Rowan to never disrespect him. In a rage, Dad pulled a switch blade out of his pocket and
6 flashed it toward Rowan Hyde. Then, Rowan charged Dad in a threatening manner, and knocked
7 him flat on the ground with some martial arts move. Dad threw the knife at Rowan. It narrowly
8 missed Rowan, only because he/she was quick and agile and dodged it. At that moment, Officer
9 Jerry Bilt pulled up in a squad car and told everyone to calm down. Rowan Hyde picked up
10 Dad's knife and pointed the knife at Dad, and firmly demanded, "You'll pay for this." Dad
11 replied, "I ain't payin' for nothin'." Then Rowan Hyde dropped the knife to the ground.

12 Rowan Hyde voiced his/her complaints with Officer Jerry Bilt – the hedges, the fire, the
13 smoke. Officer Jerry Bilt said that Rowan Hyde could be charged with battery and that Dad
14 could be charged with attempted battery or even attempted murder for throwing the knife at
15 Rowan Hyde. Officer Jerry Bilt said no charges would be filed, but that Rowan could take it up
16 with the courts in a civil lawsuit for the hedge, yard, and smoke damages. Dad laughed smugly
17 at Rowan. He took out a wad of cash, like he used to carry around in Chicago, and threw \$100
18 on the ground and said "that should take care of it." Dad was confident that he was untouchable
19 from the law because of his witness protection status. He knew Officer Bilt had been informed
20 by Marshal Teed that we were in the witness protection program. I was there for the entire
21 duration of their feud that day. It was ugly; and, it certainly didn't help with good neighborly
22 relations or us trying to blend in.

23 This was the first of many arguments and fights between Dad and Rowan Hyde. Officer
24 Bilt was called to the neighborhood at least once a month for the ongoing battle. Fists were
25 raised. Threats were made. Of course, no one took any of the threats seriously; it was all about
26 showing bravado. Rowan Hyde and my Dad were both strong willed, and neither one was going
27 to back down. Dad had been disrespected, and now, being the tough guy, made it his mission to
28 bully Rowan. He blasted music on the patio when he knew Rowan was entertaining company.
29 He would mow the grass early in the mornings or rev up his engine on his GT Mustang. The
30 sounds always irritated Rowan's dog, Grendel, a Chow Chow, who would then bark and howl at
31 the noises. Dad also knocked over Rowan's garbage cans during the night so that the garbage
32 would scatter all over his/her yard. And he beamed floodlights into Hyde's bedroom at night.
33 Dad was trying to be a menace, and had succeeded.

34 Rowan Hyde's revenge was to make sure that our yard was Grendel's bathroom every
35 time the dog needed to relieve himself. Dad threw away pair after pair of special order
36 expensive Italian shoes that had the misfortune of stepping in the wrong place at the wrong time.
37 Dad did not like, rather abhorred, Grendel. The dog always growled and barked at him
38 viciously. There were even a couple of times that Grendel tried to attack Dad. I witnessed a
39 couple of times when Grendel lunged aggressively toward Dad, but Rowan Hyde held Grendel
40 back with a leash. As time passed, Rowan Hyde seemed to not be able to control Grendel around
41 Dad anymore. It was almost as if Grendel had been trained to attack him.

1 Finally, Dad had enough of Grendel's menacing behavior when the dog bit him on the
2 hand. Later that night, on September 10, 2016, I overheard Dad leaving a voicemail message for
3 Rowan Hyde. Dad said that he would be picking up Grendel in two hours to take him to Animal
4 Control to be euthanized. Around 7 pm, Dad left the house. I assumed he was going to Rowan
5 Hyde's home to pick up Grendel. Dad did not return to the house that night.

6 By Sunday night, Dad had still not returned home. The other odd thing about his
7 disappearance was that his vehicles, the Escalade and the Mustang, were parked in the garage. If
8 he went anywhere, he would have either walked or someone picked him up. I knew that Dad
9 was planning to see Rowan Hyde, so I went to his/her house. When I arrived, I noticed that the
10 foyer rug was missing, and Grendel was nowhere to be found. Rowan Hyde said Dad did come
11 to his/her house on the evening of Saturday, September 10, 2016. Rowan described Dad taking
12 out his switchblade and threatening to take Grendel to be euthanized. Rowan said they argued.
13 Rowan Hyde claimed my Dad lunged toward Grendel with the knife. The dog and Dad battled,
14 each receiving battle wounds, according to Rowan Hyde. Dad had several puncture bites, but
15 Dad also had knifed Grendel to death. Rowan said that Dad left the house angry and said that he
16 "wanted to go back home." That was the last time that Hyde had seen my Dad. He/she had no
17 idea where Dad went next. I also asked Rowan if he/she had seen any strangers in the
18 neighborhood, and he/she said "no."

19 Rowan was visibly upset reliving the events that had unfolded on September 10th.
20 Rowan did not appear nervous or suspicious. He/She was grief-stricken that his/her pet had died.
21 He/She was more concerned about his/her dog than the whereabouts of my father. Rowan
22 mumbled something under his/her breath, but it was hard to make it out clearly. I think he/she
23 said, "I hope he's never found." Then, almost immediately, he/she apologized for being
24 insensitive as I was obviously worried for Dad's safety and well-being, and he/she said, "Don't
25 worry. I'm sure he'll walk through your front door any moment." Rowan Hyde made the
26 statement with such utter sincerity and conviction, like he/she truly believed it, that it eased my
27 worries.

28 It was not unusual for Dad not to return home recently. In the past six months, Dad
29 would leave for a day or two twice a month. I don't know where he would go. He told me that
30 he was working on a business deal. But Dad had never been gone for more than two days.
31 When he didn't return by Tuesday morning, my first instinct was that the Mafia had finally
32 caught up to him. I had reflected on Dad's statement that he "wanted to go back home" and
33 realized he wasn't talking about our home in Crown Point, but our home in Chicago. I contacted
34 Marshal Teed to let him/her know of Dad's absence and my concerns that the Mafia had caught
35 up to him. It seemed especially concerning since there were mob guys hanging around town.

36 Detective Jerry Bilt arrived at the house about an hour after I had called Marshal Teed. I
37 told him/her about the fight that Dad had with Rowan Hyde, and that Dad had been bitten by the
38 dog, and left angry from Rowan Hyde's home. Because of the concern for Dad's safety and
39 protection, Detective Bilt did not want to file a missing person report and flash Dad's picture all
40 over the wire, or have a search party looking for him. He/She said he would follow what clues
41 were available. Bilt added that Marshal Teed was in touch with informants and undercover
42 operatives to find out if there was any word on my Dad. I saw Detective Bilt go to Rowan
43 Hyde's house, but no one was home, then Detective Bilt left.

1 **Statement of Dee Ennay**

2 My name is Dee Ennay. I am the Chief Forensic Scientist and Lead Consultant in
3 Forensic Testing for Forensic Analysis Consultants based in Chicago, Illinois. I have testified
4 over 250 times in federal and state courts in eight different states regarding forensic science, with
5 particular emphasis on crime scene reconstruction and blood spatter patterns. I have testified in a
6 few cases in which organized crime was a potential factor. I have been retained as an expert for
7 both the prosecution as well as the defense. As an expert witness, I am paid \$5,000 for an initial
8 consultation and any trial testimony is billed at \$650.00 per hour. Exhibit 6 is a true and accurate
9 copy of my Curriculum Vitae. It was prepared by me and I have personal knowledge of the
10 contents of my curriculum vitae. My curriculum vitae is kept in the course of my profession as
11 an expert, and it is the regular practice for me to make such records.

12 I have been retained by the defendant Rowan Hyde to provide my expertise in forensic
13 science regarding the death of Lou Contralto. Rowan Hyde and I met briefly three years ago
14 when I attended a Knife Symposium in Indianapolis, Indiana. The Symposium included a half-
15 day trip to tour the Cutting Edge Facility to learn about the unique artisan materials and design of
16 the knives produced by the Company. I believe it is important to seize opportunities to learn and
17 have a better understanding of materials and design relevant to forensic science analysis. The
18 Cutting Edge knives were one of those new technologies. Rowan Hyde and I spoke briefly at
19 that time regarding the Company's products. I was quite impressed with the knives produced at
20 the facility. I thought it would be a good investment, as the Company was still in a start-up
21 phase. Rowan Hyde showed no interest in having investors, and we left it at that. I doubt that
22 Rowan Hyde even remembers me. I am not an investor in Cutting Edge, and only know Rowan
23 Hyde through the one brief encounter. Therefore, I have no conflicts, and I am able to give my
24 independent opinion in this case after reviewing all of the evidence presented. I came into the
25 case with no preconceived notions, and strictly looked at the facts as they were presented. I have
26 spent a total of 8 hours reviewing the statements and evidence, and then I have additional time
27 incurred in providing this statement as well as my testimony in court.

28 For purposes of providing my expert opinion in this case, I have reviewed the following:
29 the indictment, the statements made in this case, the Investigation Report dated September 14,
30 2016, and the Autopsy, along with the pathology, serology, and immunology findings, included
31 therein. I also have reviewed the trace report. I did not interview any witnesses in this case. I
32 did not examine any physical evidence. I was not present during the autopsy, and I did not see
33 the victim's body. I did not see the crime scene, nor did I see the bloodstains. I did not see the
34 dog's wounds. I did not see the knife allegedly used by the victim. I did not examine any knives
35 in Rowan Hyde's home or workplace. I did not see the rug that was removed from Rowan
36 Hyde's home. The witness written statements, autopsy, and trace evidence reports are sufficient
37 to enable me to form an expert opinion to a reasonable degree of scientific certainty.
38 Photographic evidence, lost by Officer Jerry Bilt during the investigation, would have been
39 helpful in my review of the victim's body, the crime scene, and the blood spatter. Nevertheless,
40 I do not believe it would have shown any evidence inconsistent with the information included in
41 the autopsy and police reports, as well as the witnesses' statements.

42 I approached this case as a probable homicide from a knife wound based upon the
43 indictment and prosecution's theory of the case. The indictment alleged that Rowan Hyde

1 slashed the victim's throat. Three key areas would provide relevant information – evidence from
2 the crime scenes (allegedly Rowan Hyde's residence and Cedar Lake), evidence from the
3 victim's body, and trace evidence. Relevant evidence at the crime scene includes the presence of
4 blood spatter patterns, blood type, and DNA. The autopsy would provide additional information
5 regarding wound type, cause of death, other wounds or injuries of the victim, as well as any
6 relevant toxicology reports. Trace evidence would include examining fiber analysis and
7 information regarding blood stains on clothing or other items of relevance, tire tracks, and
8 footprints, if available.

9 A Forensic Science and Crime Scene Investigation Analyst first examines whether there
10 is any blood at the crime scene. In this case, luminol was sprayed over a room to detect even the
11 tiniest droplets of blood. Several droplets of blood were located on the floor in the foyer near the
12 door. Some blood spatter was located on the wall in the foyer low to the ground. A DNA test of
13 the blood stains showed that the blood spatter on the wall was not human, but rather was from a
14 canine species. The bloodstains on the floor were a combination of canine and a match of Lou
15 Contralto. No bloodstains were a match with Rowan Hyde's DNA. However, the analysis
16 doesn't end merely because Contralto's blood was located at Rowan Hyde's house. The next
17 part of the analysis assists in determining what caused the bloodstains present at the scene.

18 As a Forensic Scientist, once blood of the victim is confirmed, the next thing to examine
19 is the Pattern Analysis, followed by a Reconstruction Analysis. Pattern Analysis looks at the
20 physical characteristics of the stain patterns including size, shape, distribution, overall
21 appearance, location and surface texture where the stains are found. In the Reconstruction
22 Analysis phase, the forensic scientist interprets what mechanisms may have caused those pattern
23 types.

24 A crime scene where bodily injury has occurred is likely to have some amount of
25 bloodstain evidence present. When blood is affected, droplets are dispersed through the air.
26 When these droplets strike a surface, the shape of the stain changes depending on the angle of
27 impact, velocity, distance travelled and type of surface. Bloodstain pattern analysis (BPA) is the
28 interpretation of bloodstains at a crime scene. BPA provides information not only about what
29 happened, but also what could not have happened. The information assists the forensic analyst
30 in reconstructing a potential crime. The BPA assists the analyst in answering questions such as:
31 (1) Where did the blood come from? (2) What caused the wounds? (3) What movements were
32 made after the bloodshed?

33 Television crime dramas depict bloodstain analysts as able to tell investigators everything
34 that occurred at a crime scene based solely on a few blood splashes or spatters. That is a
35 Hollywood fiction. BPA cannot re-enact the entire crime. Bloodstains can be interpreted with a
36 reasonable certainty, to determine what happened at specific moments in time corresponding to
37 each useable stain. In some cases, the bloodstains are too few or the volume of blood is too great
38 for analysts to reasonably render any opinion on the causes of the stains.

39 Blood behaves according to certain scientific principles, and so what may appear to be a
40 random distribution of bloodstains at a crime scene, can be used to provide clues in a given case.
41 Blood is primarily made of water. So, it behaves like water, obeying the laws of motion
42 and gravity. Particles in the blood are attracted to each other, and this cohesive property causes

1 blood to leave behind droplets. The size and shape of the droplets tell us what type of weapon
2 was used, if the suspect was right or left handed, the position of the victim and how they moved
3 during and after the attack.

4 Blood can leave the body in many different ways, depending on the type of injury
5 inflicted. It can flow, drip, spray, spurt, gush or just ooze from wounds. Bloodstains are
6 classified into three basic types: passive stains, transfer stains, and projected or impact stains.
7 Passive stains include drops, flows, and pools, typically from gravity. Transfer stains occur
8 when an object comes into contact with an existing bloodstain, such as a bloody shoe print or a
9 smear from a body being dragged. Impact stains are created when a force such as a gun or knife,
10 causes the blood to break into droplets.

11 The crime scene in the present case did not have blood spatter to suggest passive stains or
12 transfer stains. Rather the blood spatter patterns are consistent with an impact stain. The next
13 step in the analysis process then is to determine what type of force was used to create the impact
14 blood stain. Low velocity spatters (droplet size is greater than 4 mm) have large bloodstain
15 droplets and indicate the victim was struck by a large blunt instrument, or they are leaking from
16 the wound. Medium velocity spatter (droplet size is between 2 mm and 4 mm) results from
17 attacks with a blunt object or a stabbing. High velocity spatter (less than 1 mm) occurs with
18 gunshot wounds. The droplets look like a fine spray.

19 The Crime Scene Investigation in this case showed that Rowan Hyde's foyer area
20 contained primarily low velocity spatter, i.e. greater than 4 mm. This shows that the blood that
21 was lost from the victim was not the result of a stabbing or knife wound. Rather, it is consistent
22 with Rowan Hyde's statement to the police that the defendant's dog caused puncture wounds in
23 the victim. That type of injury would result in large droplets of blood.

24 Another key component of the crime scene investigation is the location of the blood
25 spatters and whether those patterns are consistent with a bleeding assailant. Patterns may
26 provide vital information about the movements and actions of the perpetrator or victim during
27 the events in question. In this instance, large droplets of the victim's blood were observed by the
28 front door of Rowan Hyde's home. This suggests that the victim may have been exiting the
29 house, after receiving puncture wounds from Rowan Hyde's dog. The Investigation report is
30 silent as to whether there was a clear track of blood outside Rowan Hyde's residence near the
31 door or along the sidewalk. Either there were no bloodstains to report or the investigation failed
32 to examine the outside perimeter for bloodstains.

33 The wounds of the victim can tell a story too. The injuries sustained by the victim, as
34 described in the autopsy report, are consistent with the low velocity bloodstain spatter found at
35 the scene. The autopsy report notes that Contralto had puncture wounds on his hands and
36 forearms, as well as a crush injury to the ulna of his right forearm. Those injuries are consistent
37 with dog bites. The measurement of those puncture wounds also is consistent with bites by a
38 large dog.

39 Mr. Contralto's body did show some signs of knife wounds. Let's talk first about the
40 elephant in the room – the slashed throat. Undeniably, Mr. Contralto had his throat slashed,
41 sometime between the dog attack and when his body was located on Wednesday, September 14,

1 2016. A slashed throat would have caused blood spatter in an arc pattern, which is common in
2 stabbings because there is arterial damage, such as severed carotids, where pressurized blood
3 spurts from the still-beating heart. Furthermore, death is not instant when the throat is slashed.
4 So, blood-spurting could occur for several minutes, spewing a significant amount of blood. No
5 such evidence of the kind was found at Rowan Hyde's home.

6 Second, the autopsy report notes seven superficial cuts on Mr. Contralto's hands and
7 arms, none of which would have been life threatening. One cut is on the heel of the palm of the
8 right hand, and there are five small cuts across the top of his fingers on the right side. On the left
9 side he has one small cut on his forearm. All of those cuts appear to be self-inflicted. This
10 evidence is consistent also with Rowan Hyde's description of the events on the night of
11 September 10, 2016. Rowan Hyde stated that Contralto used a switchblade and made repeated
12 attempts to stab Rowan Hyde's dog. The physical evidence shows that those cuts are the result
13 of Contralto injuring himself in the process. When there is a struggle during a violent attack with
14 a knife, the person with the knife can sustain injuries from that knife. During an attack with
15 multiple stabbing attempts, it is difficult, if not impossible, for the person using the knife to
16 control each action. A folding knife without a locking blade, such as the one in this case, can
17 fold across the hand of the person holding the knife. Such an event would typically cause a
18 guillotine-like knife-edge wound, either across the outer surfaces of the fingers or across the
19 wrist or the heel of the palm. With regard to the cut on his left forearm, that is also typical of a
20 self-inflicted wound while attacking someone or something else. When someone wields a knife
21 in one hand and tries to restrain a victim, in this case a dog, with the other hand, he can suffer a
22 stab wound on the back of the hand, or fingers, or on the arm of the free hand, resulting from the
23 stabbing action in the direction of the dog. Each of the cuts is relatively small and not deep,
24 consistent with the use of a small blade. The coroner was unable to match up Contralto's cuts on
25 his hands and arm to the switchblade used for two reasons: (1) the switchblade was never
26 located, and (2) the body's subsequent dump in the lake water and decomposition over three days
27 altered the shape of the incisions.

28 Establishing the cause of death for a body found in water is one of the most challenging
29 tasks in forensic science. Submerged bodies frequently show post-mortem injuries, which may
30 be confusing, even to the experienced observer. Post-mortem changes can be relatively
31 unpredictable and can significantly vary, even during a short time interval, such as that elapsing
32 from the recovery of the body to the start of the external examination or autopsy.

33 A knife wound's appearance may be useful to indicate the type of weapon, the shape and
34 relative size of the weapon used, and how the weapon was used. Knives with single cutting
35 edges such as kitchen knives cause wounds that have a clearly pointed edge, with the opposite
36 edge being squared off ('boat shaped' defect). However, cheaper domestic 'kitchen' knives
37 tended to bend and break on impact. A short, thin bladed stiff knife requires less force, and
38 therefore less depth to the wound. In this case, the knife that slashed Contralto's throat was
39 extremely sharp and precise. It required little effort to cut his throat. His throat was sliced
40 before he ever knew it.

41 Detective Jerry Bilt concludes that the victim's neck wound in this case was the result of
42 a large sized knife, such as a chef's knife, similar to the knives owned by Rowan Hyde. Such
43 conclusions are unfounded. Wound appearance is unreliable to make a conclusive determination

1 about the dimensions of a knife involved in a slashing death. First, as mentioned earlier, the
2 victim's body was submerged in water, and decomposition over three days altered the shape of
3 the incision. Second, where the blade has entered the skin at an oblique angle, the length of the
4 entry slit may be longer than expected. Third, knives are rarely pushed into the body and
5 withdrawn at exactly the same angle, and the resulting cut will appear larger than the actual size
6 of the weapon. Also, rocking movements of the knife during an assault distorts the appearances
7 of the wound, and the resultant defect is often much larger than the actual size of the blade.

8 Re-approximation of the gaping wound should have been performed in this case, but was
9 not. A "gaping" wound is difficult to determine if the angles are sharp or blunt. Re-
10 approximation of the wound edges allows one to determine that the upper angle is blunt, whereas
11 the lower angle is sharp. Re-approximation of the margins can occur by simply holding the
12 margins together; for photography, using clear tape over the wound or superglue to bind the
13 subcutaneous tissues together.

14 The evidence suggests that Contralto's fatal wound to the neck occurred from the back,
15 and not the front. This evidence contradicts the prosecution's theory that Contralto and Rowan
16 Hyde struggled during an argument and fight over the death of Rowan Hyde's dog. A cutthroat
17 wound inflicted from the front, while uncommon, would show several swipes or slashes and
18 short injuries, rather than one long continuous motion. A slash of the throat that is smooth and
19 continuous could occur from the front if the victim is completely subdued or knocked out.
20 However, the long continuous wound is generally typical of a wound inflicted from the back or if
21 the victim has been subdued. Most homicidal cutthroat injuries are inflicted from behind the
22 victim, and the head is pulled back to expose the throat, and the knife is then drawn across it.
23 The knife is drawn across the neck, by a right handed person, from left to right, starting high and
24 ending low. The homicidal cutthroat injuries inflicted from behind are usually longer. They
25 usually start below the ear, run obliquely downward and medially, then straight across the
26 midline of the neck, and end on the opposite side of the neck, lower than the point of origination
27 Therefore, in this case, the neck incision was compatible with a cut throat from behind by a right
28 handed person.

29 Presumably, Rowan Hyde's motive to murder Lou Contralto would have been
30 emotionally driven, with the harassment and abuse, and the execution by Contralto of his/her
31 dog. This case, however, has no evidence of emotionally driven injuries. Emotionally motivated
32 killings show evidence of multiple, rapid stabs that are typically uniformly deep stabs. Evidence
33 in this case shows no jagged edges, no movement.

34 For the forensic analyst, what is not present is equally as important as what is present. In
35 this case, there are several unexplained absences of evidence one would expect to find to
36 establish Rowan Hyde as the perpetrator of Contralto's death. The lack of trace evidence in this
37 case is glaring. For example, there is no trace evidence of blood splatters on any clothing that
38 Rowan Hyde allegedly would have worn when Contralto was murdered. The very nature of
39 many homicidal sharp force injury cases usually requires close contact between the killer and the
40 victim. As such, trace evidence on the victim's clothing would be expected. More specifically,
41 cast-off blood spatter consistent with medium-velocity impact spatter would be found on the
42 alleged killer's clothing or body. In this case, there is no evidence of clothing of Rowan Hyde
43 containing bloodstains.

1 I am particularly critical of the police investigation in this matter, and the inaccurate
2 conclusions that have been drawn from sloppy, incomplete work. There also is no evidence of
3 hairs, fibers, or blood present in places one would expect. For example, Claire Day claims
4 he/she observed Rowan Hyde taking what appeared to be a dead body rolled up in a rug placed
5 inside Rowan Hyde's vehicle. Yet, there is no blood matching Contralto that was found in
6 Rowan Hyde's vehicle. There are no fibers from Contralto's clothing found in Rowan Hyde's
7 vehicle or Rowan Hyde's boat located at Cedar Lake. Similarly, there were no rug fibers from
8 Rowan Hyde's home that was found on Contralto's body. Even the knives owned by Rowan
9 Hyde showed no blood stains of the victim. No fingerprint analysis was performed on the rope
10 used to submerge Lou Contralto's body. And no investigation was performed to identify tire
11 tracks, if any, that may have been left at Cedar Lake.

12 After reviewing all of the evidence, as well as the absence of key evidence, and based
13 upon my experience as a forensic analyst consultant, it is my expert opinion, to a reasonable
14 degree of certainty, that Rowan Hyde did not murder Lou Contralto.

15 *I affirm under penalty of perjury that the foregoing is true and correct to the best of my*
16 *belief and knowledge.*

17 Dee Ennay
18 DEE ENNAY

**United States Marshal Service
Witness Security Program
Memorandum of Understanding**

I agree to the following:

- (A)**
to testify in and provide information to all appropriate law enforcement officials concerning all appropriate proceedings;
- (B)**
not to commit any crime;
- (C)**
to take all necessary steps to avoid detection by others of the facts concerning the protection provided;
- (D)**
to comply with legal obligations and civil judgments against me;
- (E)**
to cooperate with all reasonable requests of officers and employees of the Government who are providing protection;
- (F)**
to designate another person to act as agent for the service of process;
- (G)**
to make a sworn statement of all outstanding legal obligations, including obligations concerning child custody and visitation;
- (H)**
to disclose any probation or parole responsibilities, and if on probation or parole under State law, to consent to Federal supervision; and
- (I)**
to regularly inform the appropriate program official of my activities and current address.

Exhibit 2

<u>Location #</u>	<u>Dates</u>	<u>Reason for Relocation</u>
1	04/09 – 06/09	Lou ordered new suit from Chicago tailor for delivery
2	06/09 – 06/10	Spotted in casino by old acquaintance
3	06/10 – 12/10	Relatives contacted; Informant tip of hitman zeroed in
4	12/10 – 4/11	Lou boasting to new co-workers of mafia ties
5	4/11 – 07/13	Newspaper picture of Lou with winning lottery ticket
6	07/13 - 09/16	Witness deceased

Exhibit 3

Lake County Sheriff Department Criminal Investigations Division Detective Bureau		Investigation Report	
Case # <i>09130115-16</i>		Prepared by: <i>Detective J. Bilt</i>	
Date of Investigation <i>09/13/16</i>	Time <i>19:30</i>		
Location of Incident/Street Address <i>12150 Hidden Links Drive</i>	City <i>Crown Point</i>	County <i>Lake</i>	
Type of Incident/Crime/Description of events <i>Missing Person</i>			
Persons Involved (full and complete name known)			
<i>Missing Person: Lou King DOB: 09/17/77 Male 5'10" 170 lbs</i>			
Vehicle Information <i>N/A</i>	Make/Model/Year/Color/Style/etc. <i>N/A</i>	License # <i>N/A</i>	State <i>N/A</i>
<p>Investigation Report</p> <p><i>09/13/16 19:30 - Called to the residence of Lou King. Son/Daughter Jo King (JK) reports that his/her father (Lou King (LK)) has been missing for three days.</i></p> <p><i>LK is in good health, physically and mentally.</i></p> <p><i>RC states not unusual for LC to be absent for a day or two, but LK's vehicles remain in the garage. JK states no other form of transportation</i></p> <p><i>JK states no suspicious or unusual events or circumstances recently.</i></p> <p><i>JK reports that LC last seen at 19:00 on Sat. 9/10/16 going to Rowan Hyde (RH) (neighbor) house regarding continuing problems with RH's canine and LK's plan to take canine to be euthanized. LK confrontational and brought switchblade</i></p> <p><i>09/13/16 19:52 Attempted to talk to neighbor RH. No answer at house. Follow-up later.</i></p>			

Lake County Sheriff Department Criminal Investigations Division Detective Bureau		Supplemental Investigation Report	
Case # 09130115-16		Prepared by: J. Bilt	
Date of Initial Investigation 09/13/16			
Location of Incident/Street Address 12150 Hidden Links Drive Ashore near lake	City Crown Point Cedar Lake	County Lake	
Type of Incident/Crime/Description of events Homicide – Body located in locked cooler			
Victim – Lou Contralto a/k/a Lou King (deceased)			
Supplemental Investigation Report			
<p>09/14/1611:00 Corpse washed ashore; appears to be Lou Contralto (LC) aka Lou King. Field observations, body has begun some decomposition, Slashed throat. Cutthroat wound is elongated suggesting large knife used. Some deep wounds to right hand, and left forearm. No identification on body. \$650 cash located on decedent. Rope wrapped haphazardly around feet of LC appears to have been hastily tied. Haphazard; sloppy. Rope unraveled. Likely tied to cement block. Ropes did not keep body submerged. No obvious tire tracks at lake property. No discernable footprints. Unable to obtain any trace evidence, such as fibers from decedent’s body and clothing due to water submersion of the body. Body bagged and delivered to Coroner.</p> <p>09/14/16 12:45 Informed Ricci Contralto (RC) aka Jo King that father is deceased and that body was dumped at Cedar Lake. RC states that the Tessitura mafia family killed LC. RC had observed suspicious strangers hanging around the neighborhood</p> <p>09/14/16 1:30 Interviewed Rowan Hyde (neighbor). On 9/10/16, LC barged into RH house threatens to kill pet. LC lunges toward canine, who attacks LC. Canine bites LC several times on the hand and forearm LC kills pet with multiple stabbings. LC received puncture wounds on hand. LC leaves and RH never sees LC again. RH uses area rug to roll up deceased pet, describes dragging it to put in back of vehicle. Buried canine on property near place of business. Discards rug at landfill because saturated with blood.</p> <p>09/14/16 3:15 RH grants access to house and car. Multiple knives located. Several large blades, may be consistent with wound. No trace blood evidence on knives. Use luminal to determine whether blood stains present, and if so pattern. Luminal reveals some small bloodstain spatters on walls in foyer and low velocity bloodstain droplets on floor by door. Large blood droplets at Rowan Hyde house – size 6 mm Bloodstain samples taken to determine if it is human or canine blood and to run DNA testing. Examine clothing owned by RH – none has trace evidence of blood from victim. No trace evidence located in vehicle.</p> <p>09/14/16 RH grants access to exhume body of pet located on property of Cutting Edge Company. Physical examination of canine. Initial observation – canine is wrapped in blanket and laid with care in makeshift grave. Canine had multiple stab wounds, appear to be from a small blade. Samples taken to confirm DNA of blood and tissue in dog’s canines.</p>			

09/14/16 Obtain statement from neighbor across street at 12151 Hidden Links. C. Day is eyewitness to rolled rug being put in back of vehicle on night of LC's disappearance

09/22/16 – lab results returned. Confirmed human blood for bloodstain near RH front door; matches DNA of RH. Bloodstain spatter pattern on wall in foyer tests positive for DNA match. Blood and tissue in RH's pet's teeth also contains matching DNA for LC.

09/22/16 – Autopsy report – confirms death by knife wound to neck. Additional wounds noted on hand and arm. Blunt blow to head present but not cause of death. See autopsy report for further findings.

Exhibit 4

2 of 2

LAKE COUNTY AUTOPSY REPORT

Name: Contralto, Lou aka King, Lou	Date of Birth: 9/17/77
Height – 5/10 Weight 170	Sex: Male
Date of Death: 09/10/16 -09/11/17	Body Identified by: 09/22/16 decedent's son/daughter; DNA testing on 9/22/17
Case # 09130115-16	Investigative Agency: Lake County Sheriff's Department

EXTERNAL EXAMINATION:

The autopsy is begun at 9:00 A.M. on September 14, 2016.

- 1) Incised cut throat injury of size 17x2 cm present over anterior part of neck in midline above the level of thyroid cartilage and cavity deep. Margins are sharp and clean cut.

Dissection discloses that the wound path is through the skin, the subcutaneous tissue, and the sternocleidomastoid muscle with hemorrhage along the wound path and transection of the left internal jugular vein, with dark red-purple hemorrhage in the adjacent subcutaneous tissue and fascia. The direction of the pathway is upward and slightly front to back for a distance of approximately 4 inches where it exits, post-auricular, in a 2 inch in length gaping stab/incised wound which has undulating or wavy borders, but not serrated.

- 2) Incised wound of size 0.4x0.1 cm present over right thumb palmer aspect of proximal aspect.

- 3.) The back of the right hand has multiple avulsed and oblique incisions and lacerations, mostly incisions, ranging from 1.5-3.2 cm long. All are superficial, linear incised wound involving only the skin.

- 4.) The left distal forearm has an incised wound of 3 x 5 cm surface area with abrasions and superficial incisions. Just proximal to that and more medial are two (2) parallel, linear, thin abrasions.

INTERNAL EXAMINATION:

On dissection of neck skin, soft tissue, muscles including platysma and sternocleidomastoid on both sides were cut, larynx at third tracheal ring, esophagus, and deeply situated carotid sheath jugular veins and carotid arteries on both sides of neck were sharply cut. Dried dark red colored blood was seen in lumen of trachea.

Abdominal wall was intact and no free fluid in peritoneal cavity noted. Internal organs were intact and pale. Spine and spinal cord was intact with no injuries. Skull shows evidence of blunt trauma. No fractures, superficial only, and not cause of death. Brain and dura was intact, brain was soft and edematous. Thoracic wall was intact with no rib fracture, both lungs were intact, pale and edematous. Heart was normal in size and shape and no abnormality was detected.

Aside from the slash wounds, there are no other internal traumatic injuries

HEAD--CENTRAL NERVOUS SYSTEM: Not available. Putrefaction of body and all organs.

SKELETAL SYSTEM: Unremarkable. Decomposition or mummification of the outer tissues covering less than one half of the skeleton. Hair follicles and nails have not been destroyed.

RESPIRATORY SYSTEM--THROAT STRUCTURES: Not available. Putrefaction of body and all organs.

GASTROINTESTINAL SYSTEM: Not available. Putrefaction of body and all organs.

URINARY SYSTEM: Not available. Putrefaction of body and all organs.

TOXICOLOGY: A sample of hair follicles, fingernails, and toenails are submitted for toxicological analysis.

SEROLOGY: Blood specimen is submitted for DNA analysis; blood and tissue found in canine's teeth are also submitted for DNA analysis

LABORATORY DATA

Toxicology: Unremarkable

Serology: DNA confirmed match with decedent in two samples: 1. blood sample located on premises of defendant and 2. Sample collected from canines draw

EVIDENCE COLLECTED: Samples of hair follicles, finger nails, and toe nails

Manner of Death: Homicide

Immediate Cause of Death: At autopsy, a deep, oblique, long incised injury was found on the front of the neck. There were no hesitant or defense injuries. The cause of death was cut throat. The findings were compatible with a homicidal cut throat by a right handed person from behind after head being restrained firmly. The left end of the injury started below the ear at upper third of the neck and deepened gradually with severance of the left carotid artery. The right sided end of the injury was at the mid third of the neck with a tail abrasion This sharp force injury of the neck is fatal, associated with transection of the left internal jugular vein.

Time of Death: Between 19:00 on 9/10/16 and 06:00 on 09/11/16. Exact time undetermined. Due to decomposition and submersion of body

/s/Sam Pohl, M.D.
Lake County Coroner's Office
09/22/16

Exhibit 5

2 of 2

CURRICULUM VITAE
of
DEE ENNAY

Education:

George Washington University, Washington, D.C.

Master of Science Degree in Crime Scene Investigation and High Technology Crime Investigation
2001

Michigan State University, East Lansing, MI

Bachelor of Science Degree, Dual Major: Chemistry & Criminalistics
1988

Position:**Forensic Analysis Consultants**

Chief Forensic Scientist and Lead Consultant in Forensic Testing
33 W. Monroe Street
Chicago, IL
2012 – present

Forensic expert in many high profile forensic cases, including fiber evidence, bloodstain pattern analysis, and crime scene search and processing

Prior Positions:

Department of Pathology State University of New York Binghamton, New York	Autopsy Assistant	2001-2002
Department of Pathology St. Francis Hospital Wichita, Kansas	Chief Chemist Blood Bank Supervisor	2002-2004
Department of Pathology Boca Raton Community Hospital Boca Raton, Florida	Forensic Scientist	2004-2008
Department of Pathology University of Chicago Chicago, IL	Supervisor of Forensic Laboratory	2008-2012

Memberships and Positions:

The American Academy of Forensic Sciences: 2010 – present
The International Association of Bloodstain Pattern Analysts: 2010 – present
Consultant, National Criminal Justice Commission: 2008 – 2010
President, American Society of Criminology: 2006 – 2008

Licenses and Certifications:

Licensed as Medical Technologist with the American Society of Clinical Pathologists Board of Registry.

Certified as Competent Forensic Expert in the Discipline of Bloodstain Pattern Interpretation by the Institute on the Physical Significance of Human Bloodstain Evidence, a division of the Laboratory of Forensic Science

Elected a Distinguished Member of the International Association of Bloodstain Pattern Analysts, 2004.

Selected Publications and Presentations:

Bloodstain Pattern Analysis with an Introduction to Crime Scene Reconstruction, Journal of Forensic Sciences

Interpretation of Knife Wound Trauma in Bone, American Academy of Forensic Sciences

Bloodspatter Patterns: Their Use in Reconstructing Crime Scenes presented at Eastern Analytical Symposium & Exposition

Bloodstain Pattern Analysis as a Reconstruction Tool at 2nd Annual Forensic Science Symposium

Basic Bloodstain Pattern Analysis Workshop, Division of Criminal Justice Services and New York State Police Forensic Investigation Center

Practical Homicide Investigation: Tactics, Procedures, and Forensic Techniques, AAFS, New Orleans, LA

Courtroom Testimony Workshop, International Association of Bloodstain Pattern Analysts