

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASEY MARIE ANTHONY,

Defendant.

CASE NO.: 48-2008-CF-0015606-O  
DIVISION: 16

JUDGE: BELVIN PERRY, JR.

**RESPONSE TO STATE'S MOTION FOR CLARIFICATION OF EXPERT WITNESSES**

COMES NOW the Defendant, CASEY MARIE ANTHONY, by and through her undersigned attorneys hereby comply with this Court's order dated December 10, 2010, in support thereof states the following:

**DR. JANE H. BOCK (Expert)**  
University of Colorado  
Ecology and Evolutionary Biology Dept.  
Boulder, Colorado 80309-0334

1. Dr. Bock's curriculum vitae is attached as exhibit 1.
2. Dr. Bock's field of expertise or medical specialty is Forensic Botany.
3. If Dr. Bock were called to testify, her specific subject area will be Forensic Botany.
4. The substance of the facts in which Dr. Bock would be called to testify, would depend on the following:
  - a. Whether the State calls Dr. Hall as an expert witness.
  - b. Whether Dr. Hall's opinions are approved by this court as being based on scientific principles (Frye challenge)
  - c. Whether Dr. Hall can effectively survive cross examination.

If this Court should allow Dr. Hall to testify, Dr. Bock would be called to rebut his findings dealing with the recovery site and his conclusions based on viewing photographs of the recovery site.

5. A summary of Dr. Bock's testimony can be obtained from viewing her affidavit as listed under exhibit 2. She would rebut Dr. Hall's where he claims that he can determine the growth rate of roots, when he doesn't even know the type of plant and without having viewed the root and seeing them from un-scaled photographs.

**DR. SCOTT FAIRGRIEVE (Expert)**  
Chair, Department of Forensic Science  
Laurentian University  
935 Ramsey Lake Road  
F-323A, Third Floor, Science 2 Bldg.

FILED IN OFFICE  
CRIMINAL DIVISION  
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1. Dr. Fairgrieve's curriculum vitae is attached as exhibit **3**.
2. Dr. Fairgrieve's field of expertise or medical specialty is forensic anthropology.
3. If Dr. Fairgrieve were called to testify his specific subject area will be that involving cadaver dogs.
4. If Dr. Fairgrieve were called to testify would depend on the following:
  - a. Will this Court for the first time in the history of this state admit testimony concerning cadaver dog "alerts" as substantive testimony.
  - b. Will this Court allow a canine to testify, via a dog handler, given Miss Anthony's 6<sup>th</sup> amendment rights to confront her accusers and despite the fact that all "alerts" in this case are unrecorded, and resulted in negative results for human remains?

The substance of Dr. Fairgrieve's testimony would depend on the above and to rebut the testimony of the cadaver dog handlers in this case.

5. Of course a dog cannot testify. In the event that the State attempts this unusual tactic, a summary of Dr. Fairgrieve's testimony is that cadaver dogs are a tool and nothing more, absent the finding of human remains in their searches, very little can be ascertained from such alerts.

**DR. HENRY LEE (Expert)**

University of New Haven  
Forensic Science Program  
300 Orange Avenue  
West Haven, CT 05616

1. Dr. Lee's curriculum vitae is attached as exhibit **4**.
2. Dr. Lee's field of expertise is Criminalistics.
3. If Dr. Lee were called to testify, the subjects that he will render opinions on are crime scene analysis, collection and preservation as well as recovery.
4. Dr. Lee inspected the Pontiac Sunfire driven by Miss Anthony. Dr. Lee also inspected the recovery site photographs and also inspected the recovery site.
5. If Dr. Lee were called to testify, the substance of the facts that he would be expected to testify would be to rebut any false claims raised by CSI investigators in this case. Until that occurs it is difficult to give a complete summary of his opinions and the grounds for those opinions.

**DR. WERNER SPITZ (Expert)**

23001 Greater Mack  
St. Clair Shores, Michigan 48080-1996

1. Dr. Spitz's curriculum vitae is attached as exhibit **5**.
2. Dr. Spitz's field of expertise is forensic pathology.
3. If Dr. Spitz were called to testify, the subject that he would render opinions' on are his autopsy findings and those of Dr. Garavaglia.
4. The substance of the facts that Dr. Spitz will testify is that on December 24, 2008, he conducted a second autopsy on the decedent and found no signs of trauma and could not find a cause of death.
5. The summary of Dr. Spitz's testimony would relate to the condition of Caylee Marie Anthony's remains and her cause of death.

**DR. KATHY REICHS (Expert)**

1818 Craigmore Drive  
Charlotte, NC 28226

1. Dr. Reichs curriculum vitae is attached as exhibit **6**.
2. Dr. Reichs' field of expertise is forensic anthropology.
3. If Dr. Reichs were called to testify, the subjects that she will render opinions on are forensic anthropology.
4. Dr. Reichs completed a full anthropological exam on Caylee Marie Anthony, she found no signs of antemortem trauma to Caylee Marie Anthony's remains.
5. If Dr. Reichs would be called to testify, the substance of the facts that she would be expected to testify to would be to rebut any false claims raised by the State's forensic anthropologists. Until that occurs it is difficult to give a complete summary of her opinions and the grounds for those opinions.

**DR. TIM HUNTINGTON (Expert)**

Asst. Prof. of Biology  
Concordia University, Nebraska  
800 N. Columbia Ave.  
Seward, NE 68434

1. Dr. Huntington's curriculum vitae is attached as exhibit **7**.
2. Dr. Huntington's field of expertise is forensic entomology.
3. If Dr. Huntington were called to testify, the subject matter that he would render opinions on are forensic entomology.
4. The substance of the facts that Dr. Huntington would testify to are to rebut the claims made by Dr. Haskill in his report and any testimony that he may provide in that regard. The only exceptions that Dr. Huntington does agree with are the insect identification (including coffin flies) and he agrees with Dr. Haskill that Caylee Marie Anthony's body decomposed at another location and NOT the recovery site.
5. Dr. Huntington's opinions will agree with Dr. Haskill that there were NO coffin flies found in the trunk of the Pontiac Sunfire, and that based on the insect activity her remains decomposed at another location. If Dr. Huntington were called to testify, he would rebut any other claims that were not based on any scientific explanations.

**DR. KENNETH FURTON (Expert)**

University Medical & Forensic Consultants, Inc.  
10130 Northlake Boulevard, Suite 214  
West Palm Beach, Florida 33412

1. Dr. Furton's curriculum vitae is attached as exhibit **8**.
2. Dr. Furton's field of expertise is forensic chemistry.
3. If Dr. Furton were called to testify the subject matter that he would render opinions on are forensic chemistry.
4. If Dr. Furton were called to testify, the substance of facts that he would testify to would relate to the cadaver dog "alerts." And those opinions rendered by the

Oakridge laboratories.

5. The substance of Dr. Furton's testimony would if he were called to testify to are that the cadaver dog is a tool, not a witness. He will be able to testify about the procedures and limitations of cadaver dogs, as well as the odors of decomposition and the limitations in sound scientific principles currently used in decompositional odors.

**DR. BARRY LOGAN (Expert)**

National Medical Services, Inc.

3701 Welsh Road

Post Office Box 433A

Willow Grove, PA 19090

1. Dr. Logan's curriculum vitae is attached as exhibit **9**.
2. Dr. Logan's field of expertise is forensic chemistry.
3. If Dr. Logan were called to testify the subject matter that he would testify to is forensic chemistry.
4. If Dr. Logan were called to testify would depend on the Court admitting for the first time in any State air samples tested by Oakridge Laboratories.
5. The summary of Dr. Logan's testimony is that he disagrees with the methodology employed by Oakridge laboratories in their "Forensic Report." That the science employed is not recognized in the scientific community.

**DR. JOHN LEESON (Expert)**

1208 Wolverine Trail

Winter Springs, FL 32708

1. Dr. Leeson's curriculum vitae is attached as exhibit **10**.
2. Dr. Leeson's field of expertise is digital forensics.
3. If Dr. Leeson were called to testify the subject matter that he would testify to is digital forensics.
4. Dr. Leeson has reviewed the reports issued by State experts Sandra Cawn and Kevin Stenger.
5. If Dr. Leeson would be called to testify, the substance of the facts that he would be expected to testify to would be to rebut any false claims raised by the State's forensic computer experts. Until that occurs it is difficult to give a complete summary of his opinions and the grounds for those opinions.

**DR. WILLIAM RODRIGUEZ (Expert)**

16465 Old Frederick Rd.

Mt. Airy, MD 21771

1. Dr. Rodriguez's curriculum vitae is attached as exhibit **11**.
2. Dr. Rodriguez's field of expertise is forensic anthropology with an emphasis in taphonomy.
3. If Dr. Rodriguez were called to testify the subject matter that he would testify to would be forensic taphonomy.
4. Dr. Rodriguez has reviewed all reports dealing with the remains of Caylee Marie Anthony and those specifically discussing decomposition.
5. If Dr. Rodriguez would be called to testify, the substance of the facts that he

would be expected to testify to would be to rebut any false claims raised by the State's forensic experts dealing with taphonomy. Until that occurs it is difficult to give a complete summary of his opinions and the grounds for those opinions.

**RICHARD EIKELENBOOM (Expert)**  
Poppeswegje 36, 8077 RT Hulshorst  
The Netherlands

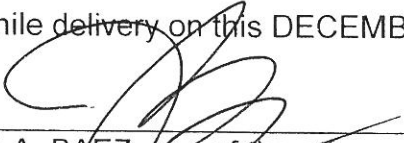
1. Richard Eikelenboom's CV is attached as exhibit **12**.
2. Mr. Eikelenboom's field of expertise is DNA, crime scene analysis and trace recovery.
3. If Mr. Eikelenboom's were called to testify, he would testify in the areas of DNA, crime scene analysis and trace recovery.
4. Mr. Eikelenboom has reviewed all of the reports and photographs taken at the recovery site and has personally inspected many of these items.
5. If Mr. Eikelenboom would be called to testify, the substance of the facts that he would be expected to testify to would be to rebut any false claims raised by the State's forensic experts dealing with DNA, crime scene analysis or trace recovery. Until that occurs it is difficult to give a complete summary of his opinions and the grounds for those opinions.

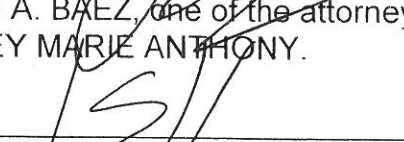
**Dr. MICHAEL FREEMAN**

1. Dr. Freeman's curriculum vitae is attached as exhibit **13**.
2. Dr. Freeman's field of expertise is that of a forensic Epidemiologist.
3. If Dr. Freeman were called to testify, he would testify in the area of forensic epidemiology.
4. Dr. Freeman is still in the early stages of consultation, the defense has notified the State of this, he was listed in an abundance of caution to meet the deadlines set by this court. No further information can be provided at this time.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing has been furnished to the Office of the State Attorney, 415 North Orange Avenue, Orlando, Florida 32801 by facsimile delivery on this DECEMBER 14, 2010.

  
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JOSE A. BAEZ, one of the attorneys for  
CASEY MARIE ANTHONY.

  
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J. CHENEY MASON, one of the attorneys for  
CASEY MARIE ANTHONY

J. Cheney Mason  
390 N. Orange Avenue, Suite 2100  
Orlando, FL 32801