

The Arizona Bar Foundation, The State Bar of Arizona Young Lawyers
Division, and the Supreme Court of Arizona present

**2022 – 2023 Arizona High School
Mock Trial Competition**

**ARIZONA
HIGH SCHOOL
MOCK
TRIAL**



State of Arizona, Prosecution

v.

Bronnie Parker, Defendant

ACKNOWLEDGMENTS

Sponsored by
The Arizona Bar Foundation
The State Bar of Arizona Young Lawyers Division
The Arizona Supreme Court

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2022 – 2023 Arizona High School Mock Trial

State of Arizona v. Bronnie Parker

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I. The Case

On Monday August 9, 2021, the quiet town of Dullsville in the Arizona high country of Cascade County experienced a first. On that day, as the bank employees of the Dullsville branch of the Cascade Community Bank opened for business a person dressed in a black mask, hoodie, black gloves, jeans, and white sneakers entered the facility, pointed a silver handgun at the bank manager and gave instructions via a note, "Put Everything Behind the Counter in the Bag." When all was said and done the masked person fled the scene with roughly \$3,000. For the first time that anyone could remember, a Dullsville bank had been robbed. Local authorities were stumped and had little to go on other than eyewitness descriptions. The bank's security cameras were not operational that morning due to a scheduled service upgrade. It seemed that this robbery may remain an open case.

Two days later, on Wednesday, August 11, 2021, a similar event took place not too far from Dullsville. This time the Randolph River branch of the Cascade Community Bank was the target. As with the robbery two days earlier, a person in a black mask, hoodie, black gloves, jeans, and white sneakers entered the facility early in the day, pointed a silver handgun at those inside and handed a teller a note instructing them to put everything behind the counter into a paper bag. This time the robber escaped with just over \$5,000. Once again, the cameras, due to service upgrades, were inoperable and no footage of the event was captured. When local police officers and detectives arrived, it seemed that they were once again without much to go on for their investigation, yet this time something was different. A teller at the Randolph River branch had placed a GPS tracking device into the robber's bag amongst the stolen cash. The authorities tracked that GPS signal all the way to an off ramp just off Interstate 17 and near the Chalmer's Casino.

On Thursday, August 12, 2021, Bronnie Parker walked into the Dullsville branch of the Cascade Community Bank and handed over a check for \$5,212.14 to make Bronnie current on Bronnie's mortgage payment. Since being fired from Bronnie's former employer, Dewing Security, back in January 2021, Bronnie had been having a difficult time paying the monthly mortgage, missing payments from March to July. Bronnie's payment came at just the right time, as the bank was set to foreclose on Bronnie's house that week. The check made out to the bank for the exact amount due was issued by Chalmer's Casino the day prior, August 11, 2021.

Following Bronnie's visit to the bank, the branch manager, Lolo Baldwin, called Detective Elliot Kress to report the interaction with Bronnie and some uneasy feelings about the entire situation. Bronnie had mentioned that a lucky night in the casino was the origin of the sudden cash windfall and Lolo began to draw connections between Bronnie and Monday's robbery, including Bronnie's involvement in scheduling the bank's security camera upgrades when still working for Dewing Security. After a brief investigation by Detective Kress, Bronnie Parker was arrested and indicted on two charges of armed robbery for both the August 9th and August 11th robberies at the respective Cascade Community Bank branches.

A. Witness List

Prosecution Witnesses:

- 1) Elliot Kress
- 2) Lolo Baldwin
- 3) Allie Pinkerton

Defense Witnesses

- 1) Bronnie Parker
- 2) Pat Hurst
- 3) Dolray Mapp

B. List of Exhibits

Exhibit 1: Bank GPS Location Map

Exhibit 2: Parker's August Mortgage Check

Exhibit 3: Parker's Car Title

Exhibit 4. Dullsville Branch Mortgage

Foreclosure Letter to Parker

Exhibit 5. Area Map – Parker's Google Location Data

C. Indictment, Stipulations, Jury Instructions

IN THE CIRCUIT COURT OF THE STATE OF ARIZONA FOR CASCADE COUNTY

THE STATE OF
ARIZONA,

Plaintiff,

v.

BRONNIE PARKER,

Defendant.

No. 21CR06118

INDICTMENT – Secret

The above-named defendant is accused by the Grand Jury of Cascade County by this indictment of the crime(s) of

Count 1: ARMED ROBBERY (A Felony; A.R.S. § 13-1904)

Count 2: ARMED ROBBERY (A Felony; A.R.S. § 13-1904)

committed as follows:

COUNT 1:

The defendant, on or about August 9, 2021, in Cascade County, Arizona, while armed with a deadly weapon, took property of another person from the other person’s person or immediate presence, against the other person’s will, while using or threatening to use force against any person with the intent to force surrender of the property or to prevent resistance to taking or keeping the property. .

COUNT 2:

The defendant, on or about August 11, 2021, in Cascade County, Arizona, while armed with a deadly weapon, took property of another person from the other person’s person or immediate presence, against the other person’s will, while using or threatening to use force against any person with the intent to force surrender of the property or to prevent resistance to taking or keeping the property. .
contrary to the statutes and against the peace and dignity of the State of Arizona.

Dated: August 26, 2021

Witnesses subpoenaed, examined, and appeared in person unless otherwise indicated before the Grand Jury for the State of Arizona:

Elliot Kress Lolo
Baldwin Allie
Pinkerton

A TRUE BILL

s/Isabella Goodwin

Foreperson of the Grand Jury

GEORGIA ANN ROBINSON, District Attorney

s/Mary Sullivan

Mary Sullivan, ASB No.
011916 Deputy District
Attorney

IN THE CIRCUIT COURT OF THE STATE OF ARIZONA FOR CASCADE COUNTY

THE STATE OF
ARIZONA,

Plaintiff,

v.

BRONNIE PARKER,

Defendant.

No. 21CR06118

STIPULATIONS

The parties stipulate and agree to the following:

1. Each witness testifying at trial has waived and agreed not to assert his or her right against self-incrimination, whether arising under the Fifth Amendment to the United States Constitution, Article 2, Section 10 of the Arizona Constitution, or otherwise.
2. For purposes of Rule of Evidence 609(b), the state has given the defense reasonable written notice of its intent to offer the prior conviction of Pat Hurst, such that, should the government ultimately choose to offer it, the defense has had a fair opportunity to contest its use.
3. On both August 9, 2021, and August 11, 2021, each branch of Cascade Community Bank was in the process of upgrading its security system, which means that neither of the robberies that occurred on those dates were captured on any video or audio recording system. A deadly weapon was used during the course of each robbery.
4. Exhibit 5 accurately depicts data obtained from Bronnie Parker's Google account concerning the date, time, and physical location of an Android mobile device associated with the account. The account contains no data indicating that the device was in Randolph River at any time on August 11, 2021. Both parties have waived all objections arising under Rules of Evidence 801-805 to any of the foregoing information.

IN THE CIRCUIT COURT OF THE STATE OF ARIZONA FOR CASCADE COUNTY

THE STATE OF
ARIZONA,

Plaintiff,

v

BRONNIE
PARKER,

Defendant.

No. 21CR06118

FINAL JURY INSTRUCTIONS

The Court will now submit the case to the jury; you need to decide, based on the law and the evidence presented to you at trial, whether the prosecution has prevailed in proving the prosecution's charges against the defendant.

EVALUATING WITNESS TESTIMONY

In deciding the facts of this case, you should consider what testimony to accept, and what to reject. You may accept everything a witness says, or part of it, or none of it.

In evaluating testimony, you should use the tests for truthfulness that people use in determining matters of importance in everyday life, including such factors as: the witness's ability to see or hear or know the things the witness testified to; the quality of the witness's memory; the witness's manner while testifying; whether the witness had any motive, bias, or prejudice; whether the witness was contradicted by anything the witness said or wrote before trial, or by other evidence; and the reasonableness of the witness's testimony when considered in the light of the other evidence.

Consider all of the evidence in the light of reason, common sense, and experience.

DIRECT AND CIRCUMSTANTIAL EVIDENCE

Evidence may be direct or circumstantial. Direct evidence is the testimony of a witness who saw, heard, or otherwise sensed an event. Circumstantial evidence is the proof of a fact or facts from which you may find another fact. The law makes no distinction between direct and circumstantial evidence. It is for you to determine the importance to be given to the evidence, regardless of whether it is direct or circumstantial.

EXPERT WITNESS

A witness qualified as an expert by education or experience may state opinions on matters in that witness's field of expertise, and may also state reasons for those opinions.

Expert opinion testimony should be judged just as any other testimony. You are not bound by it. You may accept it or reject it, in whole or in part, and you should give it as much credibility and weight as you think it deserves, considering the witness's qualifications and experience, the reasons given for the opinions, and all the other evidence in the case.

WITNESS (PRIOR CONVICTION)

You have heard evidence that a witness has previously been convicted of a criminal offense. You may consider this evidence only as it may affect the witness' believability.

INTENT - INFERENCE

“Intentionally” or “with intent to” as used in these instructions means that a defendant’s objective is to cause that result or to engage in that conduct.

Intent may be inferred from all the facts and circumstances disclosed by the evidence. It need not be established exclusively by direct sensory proof. The existence of intent is one of the questions of fact for your determination.

BURDEN OR PROOF—PROOF BEYOND A REASONABLE DOUBT

The State has the burden of proving the defendant guilty beyond a reasonable doubt. This means the State must prove each element of each charge beyond a reasonable doubt. In civil cases, it is only necessary to prove that a fact is more likely true than not or that its truth is highly probable. In criminal cases such as this, the State’s proof must be more powerful than that. It must be beyond a reasonable doubt.

Proof beyond a reasonable doubt is proof that leaves you firmly convinced of the defendant’s guilt. There are very few things in this world that we know with absolute certainty, and in criminal cases the law does not require proof that overcomes every doubt. If, based on your consideration of the evidence, you are firmly convinced that the defendant is guilty of the crime charged, you must find the defendant guilty. If, on the other hand, you think there is a real possibility that the defendant is not guilty, you must give the defendant the benefit of the doubt and find the defendant not guilty.

CRIMINAL CHARGES - ARMED ROBBERY

The crime of armed robbery requires proof of the following:

1. The defendant took property of another person; *and*
2. The taking was from the other person’s person or immediate presence; *and*
3. The taking was against the other person’s will; *and*
4. The defendant used or threatened to use force against any person with the intent to force surrender of the property or to prevent resistance to taking or keeping the property; *and*
5. The defendant, in the course of committing the robbery, was armed with a deadly weapon.

VERDICT—FELONY CASE

When you return to the jury room, select one of your members to act as presiding juror. The presiding juror has no greater voting weight but is to preside over your deliberations and be the spokesperson for the jury. You should then deliberate and find your verdict. If it becomes necessary during your deliberations to communicate with me, do so in writing. I will consult with the parties before responding.

Your verdict must be supported by a unanimous vote. Remember that you are not to tell anyone, including me, how the jury stands numerically until you have reached a lawful verdict or have been discharged. When you have arrived at a verdict, the presiding juror will sign the appropriate verdict form. After you have reached your verdict, signal the bailiff. The court will receive your verdict.

PROSECUTION WITNESS STATEMENTS

1 being a detective: sometimes, you've just got to let your instincts lead the way.

2 As far as I'm aware, this case is Cascade County's first bank robbery. On the morning of Monday,
3 August 9, 2021, I had just settled in at my desk and was catching up on some paperwork when I got a call
4 from a 911 dispatcher. She told me there had just been a robbery at the Dullsville branch of Cascade
5 Community Bank and asked me to high tail it down there as fast as I could. As I was running to my car, I
6 was puzzled. Why in the world would someone rob a bank in Dullsville, of all places? Dullsville is one of
7 the smaller towns in the county, which means a bank teller there probably isn't going to be sitting on a
8 huge pile of cash. Plus, in terms of what's in the vault, Cascade Community Bank isn't exactly Fort Knox.
9 Like the name implies, it is (by banking standards, anyway) a tiny operation with just two branches, one
10 in Dullsville and the other about 30 minutes east in Randolph River.

11 I arrived in Dullsville at about 9:30 a.m. A CCSO patrol officer had secured the scene and was
12 talking with two witnesses who, I learned, were the bank's manager and assistant manager. I interviewed
13 each separately. I began with Lolo Baldwin, the manager. Though understandably somewhat shaken, Lolo
14 was composed during the interview, and answered each of my questions clearly. Everything Lolo told me
15 is reflected in Lolo's affidavit, which I have reviewed.

16 When I finished with Lolo, I spoke with Johnnie Connolly, the bank's assistant manager. Unlike
17 Lolo, Johnnie was a nervous wreck. While we talked, his eyes kept darting back and forth, he stuttered, and
18 he couldn't seem to focus on my questions; "Sorry, I'm in shock, that was just too much! Too far!" he
19 said. Johnnie's recollection of the robbery was the same as Lolo's—with one exception. When I asked for
20 a physical description of the robber, Johnnie estimated that the robber was five or six inches taller and 30
21 or 40 pounds heavier than the person I now know to be Bronnie Parker. The difference in Lolo and
22 Johnnie's accounts of the robbery didn't bother me, because it seemed clear that Lolo's description was
23 the more reliable one. I've spoken with plenty of eyewitnesses in my years as a detective, and I know the
24 psychological effect that shock can have on a person's memory. You see, the stress of a traumatic event
25 like a robbery can make someone's memory a bit fuzzy, even just a few minutes after the event occurs,
26 some people's memories get all hazy and they can't remember details all that well.

27 Unfortunately, at that point, we hit a bit of a dead end. The bank hadn't captured the robbery on
28 camera, and though we searched up and down, we couldn't locate any usable fingerprints. At that point,
29 the older, light blue sedan was our only lead. (Talk about a needle in a haystack... I've seen quite a few
30 of those around Cascade County!) For about the next 48 hours, there wasn't much we could do but hope
31 for a breakthrough.

32 On Wednesday morning, we got one—sort of. That morning, I was in the office poring over what
33 little evidence we had when I got another call from another 911 dispatcher. I couldn't believe it: he told

1 me there had just been a bank robbery at the other Cascade Community Bank branch in Randolph River.
2 I sprinted to my car and got there about 35 minutes later, at 9:40 a.m. When I arrived, a CCSO patrol
3 officer had secured the scene and was talking to five witnesses. The patrol officer indicated to me that two
4 were tellers and three were customers.

5 I spoke first with one of the tellers, who told me his name was Chris Parrucci. He was visibly
6 shaken by the robbery and was breathing into a paper bag when I approached him. When I approached
7 him, he blurted out, “I can’t believe that just happened! I thought I was going to die!” I tried to calm him
8 down, but it didn’t seem to work. He told me—his voice shaking—that he and his co-teller had opened
9 the bank at 9:00 a.m., and three customers had just walked in, when a masked robber burst loudly through
10 the front doors, brandished a silver handgun, and shoved a note in front of Chris demanding that he put
11 “everything behind the counter” into a paper bag. Chris did so, he said, packing a little over \$5,000 from
12 the tills and a small safe into the bag. He handed it to the robber, who, Chris remembered, then sped away
13 in an older, light-blue sedan (the make and model of which he didn’t recognize, and whose license plate
14 he didn’t see). According to Chris, the robber didn’t say anything. His voice still quivering, Chris gave
15 the same physical description of the robber as Lolo (white sneakers, blue jeans, a black hoodie, a black
16 mask, and black gloves) and indicated that the robber was approximately the same height and weight as
17 Bronnie Parker. Chris also explained that, like the Dullsville branch, the bank was in the process of
18 upgrading its security system, which meant the robbery wasn’t captured on video.

19 When I finished with Chris, I turned to one of the customers. A minute or two into that
20 conversation, though, Chris tapped me on the shoulder. He seemed much calmer than before; “Sorry about
21 that, detective,” he said coolly, “I just needed a minute. I’m better now.” He said he wanted to tell me two
22 more things. First, Chris said, he was a little unsure of the physical description he had given me just a
23 moment earlier; the robber, he indicated, actually might have been taller and heavier than his original
24 statement suggested. Second, he had forgotten to tell me that, as he was putting the money in the bag, he
25 had slipped a small GPS device in with the bills. We could access it, he said, using a cloud-based computer
26 program, the login information for which he gave me on a scrap of paper. I dropped everything—we had
27 a chance to catch the robber! I immediately called Allie Pinkerton, the CCSO Detective Bureau’s computer
28 forensic specialist, and relayed the login information. A moment later, Allie told me, “Looks like your
29 robber’s heading north on Interstate 17 toward Rowe. Go!” I jumped in my car with a patrol officer, flipped
30 on the siren, and sped away.

31 Rowe is about an hour north of Randolph River. We had almost caught up to the tracker when, to
32 my dismay, Allie called me back. “Looks like your robber dumped the tracker,” he said with a groan. “It’s
33 on the exit ramp to Zell Avenue.” We sped to the ramp, and about halfway down the ramp, we located the

1 device on the side of the road. I was beside myself. We had lost what might have been our only chance to
2 catch this robber! I paused for a moment and looked over the ramp's barrier at Chalmer's Casino, which
3 is located next to the highway and just off the exit ramp. (Exhibit 1 shows the ramp, the place where I
4 found the GPS device, and the casino. The distances indicated on the exhibit are accurate.)

5 I thought we had hit another dead end. I drove back to Randolph River and interviewed the
6 remaining witnesses, none of whom were able to tell me anything useful about the robber. And, like the
7 Dullsville robbery, we weren't able to locate any usable fingerprints in the bank itself.

8 The next day, though, we caught the break that ended up solving the case. Out of the blue, Lolo
9 called me and told me that one of the bank's customers, Bronnie Parker, had just come into the Dullsville
10 branch and paid off Bronnie's mortgage in full. "So what?" I asked. "Well," Lolo said, "Bronnie's been
11 delinquent in paying for months now. If Bronnie hadn't gotten current by Friday, we were going to
12 foreclose on the property. Bronnie told me that Bronnie had won the money at Chalmer's Casino, but I
13 don't believe it." In that moment, it all clicked: Bronnie had robbed the bank to avoid losing Bronnie's
14 property. I drove down to Dullsville and collected the check that Bronnie had used to pay off the mortgage,
15 which had been issued from Chalmer's Casino. (A copy of that check is shown in Exhibit 2.) I knew then
16 that I had to talk directly with Bronnie. I looked up Bronnie's address and drove over there.

17 When I arrived, I saw a small house on what looked like an average sized lot. I walked up,
18 knocked on the door, and Bronnie answered. "What's this about?" Bronnie asked abruptly. I thought that
19 was odd; I was wearing plainclothes, and I hadn't yet identified myself as a cop. I didn't want to tip my
20 hand before taking Bronnie's temperature, so, after identifying myself, I told Bronnie that we had
21 received a report that a car had been stolen in the area—an old, light blue sedan, to be exact. Had
22 Bronnie seen a car matching that description? "Well, um..." Bronnie seemed to hesitate. "I used to own
23 an old, light blue Lincoln, but I sold it earlier this week." I asked to whom Bronnie had sold it. "Well,
24 uh..." Bronnie hesitated again. After a beat, Bronnie said, "I can't remember. It was just some guy I
25 connected with on Craigslist." It was then that I knew I had to make my move. "Where were you on
26 Monday morning?" I said. Bronnie's eyes widened at that question. "M-Monday?" Bronnie stammered.
27 "I, uh... I was at home." "Anyone with you? Anyone who can verify that?" I continued. "I mean... no, I
28 guess not. I was at home watching TV the whole morning," Bronnie said weakly. I asked Bronnie the
29 same question about Wednesday morning and got the same answer. "Look," Bronnie said, "I really need
30 to get going. Can you come back later?" Bronnie then abruptly shut the door in my face; Bronnie never
31 asked why I wanted to know Bronnie's whereabouts on Monday and Wednesday.

32 I did come back later—with warrants for Bronnie's arrest and to search the house. In the house,
33 in a desk drawer, we found the title to a blue 1991 Lincoln Town Car, a copy of which is shown in

1 Exhibit 3. We also found a black hoodie, jeans, and black leather gloves. We didn't find white sneakers,
2 a mask, or a gun, but I figured Bronnie had just ditched those. We also didn't find any cash, but Bronnie
3 must have just spent it.

4 I'm sure Bronnie is our robber. We never looked at anybody else for the crime, but why would
5 we? Just to confirm his eyewitness account, I wanted to talk more with Johnnie Connolly about his
6 physical description of the robber, but I wasn't able to locate him. I visited both his apartment and the
7 Dullsville bank, but he had stopped coming to work a few days after the robberies. As far as I could tell,
8 he disappeared. Doesn't matter, though—Bronnie is guilty.

9 I hereby attest to having read the above statement and swear or affirm it to be my own. I also
10 swear or affirm to the truthfulness of its content. Before giving this statement, I was told it should
11 contain all relevant testimony, and I followed those instructions. I also understand that I can and must
12 update this affidavit if anything new occurs to me until the moment before I testify in this case.

13 s/Elliot Kress
14 Elliot Kress
15 Dated: October 4, 2021
16

17 Subscribed and sworn before me on October 4, 2021.

18 s/Roberta Bost
19 Roberta Bost
20

1 ended up scheduling the installation for August of this year, which is why the banks did not have cameras
2 working on the days of the robberies.

3 In January, we had an inspection scheduled, but it wasn't Bronnie who showed up. The new
4 inspector—her name was Beth, I think—said that Bronnie had been let go from Dewing Security.
5 “Bronnie had been stealing from the company, I heard,” she told me. I didn't follow up, but I found that
6 pretty concerning. After all, Bronnie had access to basically all the secure areas of our branches when
7 performing inspections. Had Bronnie ever lifted a few dollars from a teller's counter without us knowing?

8 Bronnie made Bronnie's February mortgage payment, but in March, all we got from Bronnie was
9 radio silence. Bronnie then missed the April and May payments as well. I tried calling Bronnie toward the
10 end of April, but I got a prerecorded message indicating that the line had been disconnected. In mid-May,
11 I decided to drive out to Bronnie's house in person to see what was going on. When I got to the house, it
12 was looking pretty dilapidated; the grass hadn't been cut for what seemed like several weeks, Bronnie's
13 mailbox was stuffed to the brim, and there was a huge pile of trash accumulating in front of the garage,
14 which was closed. (I didn't see a vehicle on the property, but I assumed it was in the garage.) I knocked
15 on the front door, and Bronnie answered, looking surprised and a little worried when Bronnie saw it was
16 me. Bronnie looked just as dilapidated as the house; there were huge bags under Bronnie's eyes, and
17 Bronnie's hair was unkempt. “Hey, Bronnie,” I said, “I've tried calling, but I haven't been able to get
18 through. Is everything okay?” “Well, uh,” Bronnie replied sheepishly, “I lost my job at Dewing back in
19 January, and I've been in sort of a rough patch. Money-wise, I've just really been in a jam, a bad one.” I
20 wanted to be as compassionate as I could: “Well, we do need to talk about your mortgage, but we also
21 want to be reasonable. Do you think you'll be able to resume your payments soon?” “Um,” Bronnie
22 stammered, “about that... I'm looking for work, but there just seems to be nothing out there.” “Well,” I
23 said, “normally, we'd begin foreclosure proceedings after 120 days on nonpayment, which would put us
24 at about June 1st. But I think we can be flexible. Do you think you'll be able to get back on track by July
25 1st?” “I'll do my best,” replied Bronnie halfheartedly. I thanked Bronnie and walked away hoping for
26 both of us that Bronnie would soon get back on Bronnie's feet.

27 Unfortunately, though, July 1st came and went, and we still hadn't received a cent from Bronnie.
28 I drove out to Bronnie's house again mid-month, but when I knocked on the door, nobody answered,
29 although I'm positive I heard footsteps inside. (The mailbox, I noticed, had been emptied.) At that point,
30 we were basically out of options; we're a small bank, and we had “floated” Bronnie for as long as we
31 could. On July 26th, I sent Bronnie a letter indicating that we could begin foreclosure proceedings on
32 August 13th if Bronnie hadn't caught up on Bronnie's payments by then. A copy of the letter I sent to

1 Bronnie is shown in Exhibit 4. Sending letters like that is undoubtedly the worst part of my job, but
2 unfortunately, it's an unavoidable reality in the banking business.

3 On the morning of August 9th, I had pretty much forgotten about Bronnie. I arrived at our
4 Dullsville branch a little before 9:00 a.m. to open things up. Johnnie Connolly, our assistant manager,
5 arrived at the same time, and we had just unlocked the bank's front door when I heard rapid footsteps
6 behind us. When I turned around, I froze. I saw a person dressed in white sneakers, blue jeans, a black
7 hoodie, a black mask, and black gloves. The person was approximately the same height and weight as
8 Bronnie, though, given the disguise, I couldn't have said with absolute certainty that the person *was*
9 Bronnie, at least not at that time. Truth be told, though, the person's physical appearance wasn't what I
10 was focused on. The person was pointing a small, silver handgun directly at my chest. With the person's
11 other hand, the person threw a paper grocery bag and a crumpled note at my feet, which, when I unfurled
12 it, read in computer-printed font: "PUT EVERYTHING BEHIND THE COUNTER IN THE BAG." The
13 person didn't say anything but gestured with the gun toward the door when I looked up. Both of us shaking,
14 Johnnie and I opened the door, moved behind the counter, and emptied the tills and the contents of a small
15 safe behind the counter into the bag, which I then placed on the ground in front of the person. I'd estimate
16 that we put a little over \$3,000 in the bag. As soon as the bag hit the floor, the person grabbed it, ran
17 outside, jumped into what looked like a light blue sedan, and sped away. I didn't catch the make, model,
18 or license plate number; I was in shock! What's more, it occurred to me in that moment that we wouldn't
19 have video of the robbery; our new hi-res cameras had been put up on the walls, but we were still waiting
20 for a different technician to come by and activate the system. Now that I think about it, Bronnie was the
21 one who had scheduled the activation date.

22 As soon as I could compose myself, I reached under the teller's counter and hit our alarm. A patrol
23 officer from the Cascade County Sheriff's Office arrived about 20 minutes later. (I guess they had to drive
24 all the way down from Coho City; Dullsville is small enough that it's only got two cops in its police
25 department, and neither seemed to be on duty that morning.) A detective named Elliot Kress arrived a few
26 minutes after that, and I told the detective everything that had happened. I also mentioned—with a note
27 of frustration in my voice—that Dewing Security was in the process of replacing our security cameras, so
28 nothing was caught on video.

29 In the day or so that followed, I still couldn't believe it. Why would someone rob a small
30 community bank like ours? It just seemed so senseless. You can only imagine my shock when I heard from
31 Detective Kress on Wednesday that our other branch had been hit by the same robber. What was
32 happening? I couldn't imagine who would do such a thing.

1 On Thursday morning, though, it all came into focus. At about 10:00 a.m. that morning, Bronnie
2 Parker walked into the Dullsville branch. I was surprised, given Bronnie’s prior lack of communication.
3 “Bronnie!” I said with a smile. “What brings you in today?” “Hi Lolo,” Bronnie said nervously, “Um, I
4 have this for you.” Bronnie handed me a check for \$5,212.14—which was the exact amount that Bronnie
5 owed on Bronnie’s mortgage at that point, including late fees. That check is shown in Exhibit 2.
6 (Presumably, Bronnie had been receiving the paper mortgage statements we send in the mail each month;
7 that’s the only way we communicate that sort of information to our customers.) At first, I was elated.
8 “Wow, Bronnie!” I said. “Mind if I ask how you came up with it?” “Just had a lucky night at the casino,”
9 Bronnie replied with a smirk. I laughed, didn’t think much of it, and shook Bronnie’s hand as hard as I
10 could.

11 As Bronnie walked out the door, though, a darker thought came over me: was Bronnie the robber,
12 and was Bronnie paying us back with our own money? Immediately, I called Detective Kress and
13 recounted what had happened. Detective Kress came by to collect Bronnie’s check, and, well, the rest is
14 history.

15 There’s not a doubt in my mind that Bronnie robbed us. I mean, how else could Bronnie have come
16 up with that much money so fast? In September, Bronnie paid Bronnie’s monthly mortgage payment—a
17 little over \$600—in cash, mostly in \$5, \$20, and \$50 bills. Unfortunately, we don’t have the technology
18 to determine whether those bills are the same ones that were behind our counters on the days of the
19 robberies, but I can tell you that most of the cash we keep behind the counter is usually in those
20 denominations. The next month, shortly before Bronnie’s payment was due, we received direct deposit
21 authorization paperwork from a place called Hehnke’s Espresso House. Since then, we’ve received regular
22 mortgage payments from Bronnie via direct deposit. (I guess someone gave Bronnie a job?)

23 A few days after the second robbery, I arrived at the bank for work, and Johnnie was nowhere to
24 be found. That was really odd, I thought. I’ve always thought Johnnie was a little shifty, but, then again,
25 he also was as punctual as pie, and had been a thoroughly reliable employee. Johnnie hasn’t returned, and
26 I haven’t heard from him, since then. For a moment, I was tempted to wonder whether Johnnie was in on
27 the robbery, particularly because Johnnie and Bronnie seemed to be pretty friendly whenever Bronnie
28 stopped by for an inspection. In fact, a few times, I heard the two of them talking together about how much
29 they liked the movie *Butch Cassidy and the Sundance Kid*. But the thought that Johnnie would’ve actually
30 committed a robbery in real life? That’s ridiculous. Sure, Johnnie can have a temper—I’ve had to talk
31 with him a few times about speaking a bit too aggressively with disgruntled customers—but I just can’t
32 see him having a hand in this. He was one of the victims, after all!

1 I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear
2 or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain all
3 relevant testimony, and I followed those instructions. I also understand that I can and must update this
4 affidavit if anything new occurs to me until the moment before I testify in this case.

5 s/Lolo Baldwin

6 Lolo Baldwin

7 Dated: October 1, 2021

8
9 Subscribed and sworn before me on October 1, 2021.

10 s/Roberta Bost

11 Roberta Bost

12

1 Facebook. Frankie and I extracted that data from her phone, and she ended up getting prosecuted. Some
2 people, you know? (I heard through the grapevine that she was acquitted, though.)

3 Anyway, this case involves global positioning system or “GPS” technology, with which I’ve got
4 plenty of experience. In college, I attended several lectures given by Professor Bradford Parkinson, who
5 developed much of the technology underlying the GPS system in the 1970s. That technology, as well as
6 its various law enforcement applications, was also a key topic covered during my classes at the University
7 of Arizona. And, maybe most saliently, I’ve worked several times with GPS technology in my career at
8 the CCSO. For the most part, I’ve used the technology to locate automobiles that officers believe are or
9 will imminently be involved in criminal activity. All of the work I’ve done with GPS systems—including
10 my work in this case—has been based on what I consider to be sufficient facts and data. It’s similarly
11 based on what are widely accepted as reliable principles and methods, all of which I have applied reliably
12 in the cases I’ve worked on.

13 On the morning of August 11, 2021, I was sitting at my desk tinkering with an infrared camera
14 when I received a call from Detective Elliot Kress. “Allie,” barked Detective Kress, “grab a pen. We’ve
15 got another robbery down at Cascade Community Bank, and it looks like one of the tellers managed to
16 slip a GPS device into the bag of cash.” I practically fell out of my chair. I had heard around the water
17 cooler of the first robbery, and I knew from Detective Kress that we basically had zero leads. Detective
18 Kress told me that the GPS device was one manufactured by a company called 4XT Security Systems, a
19 company based in Pennsylvania. I’m familiar with those systems—in fact, the CCSO has used them in
20 other contexts before—and was glad to know that I’d be working with technology with which I was
21 familiar, and which I consider to be especially reliable.

22 Let me pause for a moment, though, to explain how GPS technology works. It involves two basic
23 components: a “receiver,” which is the tracker whose position we’re monitoring on the ground, and
24 satellites, which orbit the earth and are used to determine the receiver’s position with precision. The basic
25 concept is fairly simple: the satellites broadcast electromagnetic waves to the receiver, which are
26 modulated to convey information concerning the time at which the signals are transmitted. Unsurprisingly,
27 these are called “time of transmission” or “TOT” values. Then, when it receives the signal, the receiver
28 calculates the signal’s time of arrival (a “TOA” value) based on its own internal clock. The difference
29 between those values is called the “time of flight” or “TOF” value. Since the speed of those waves is, as
30 a matter of physics, always going to be constant, the TOF value will be proportional to the distance
31 between the satellite and the receiver at that moment. Using a similar process, the system can
32 independently determine each satellite’s position at each TOT, so, based on that data and the receiver’s

1 TOF value, the receiver can calculate exactly how far away from the satellite it is at that moment. Sounds
2 simple enough, right?

3 Well, it's actually a little more complicated. In order to accurately determine the real position of
4 the receiver, you need to calculate *four* separate values. After all, if I simply told you that I was a hundred
5 feet away from you, you wouldn't know exactly where I was based on that information alone, would you?
6 Are you a hundred feet in front of me? Behind me? Above me? The first three values correspond to what
7 are commonly known as Cartesian coordinates, *i.e.*, latitude, longitude, and height relative to the geoid
8 (which essentially means height above sea level). The fourth has to do with the difference between the
9 satellites' clocks and the receiver's clocks. While the satellites all have extremely reliable atomic clocks,
10 it's usually going to be impractical to put an atomic clock into a receiver—particularly one as small and
11 inexpensive as the one we're discussing here. That means there will almost always be small differences
12 between the receiver's clock and the satellites' clocks, which, in order to accurately calculate the receiver's
13 position, need to be accounted for.

14 So, four values means that a receiver needs four satellites in order to calculate its location
15 accurately. Based on those four values, the receiver then can calculate its position, which a user than can
16 see in an overlaid map; think of what you typically see on your phone when you open your "Maps" app.

17 GPS technology, including the 4XT system that I was using on the 11th, is *extremely* reliable.
18 There currently are 32 GPS satellites orbiting the earth in different positions, which means it's virtually
19 impossible for a receiver anywhere in the world to have access to fewer than the required four at any given
20 time. In fact, a given receiver often has access to between six and ten satellites at any given moment; that
21 extra data makes the positioning process even more reliable.

22 Like any computer system, though, the GPS system isn't 100% perfect. There are two primary
23 aspects of it that can lead to small imperfections, although I have to emphasize that such errors are usually
24 only a matter of a few feet, if that. First, in some cases, GPS satellites will sometimes "drift" in their orbits,
25 leading to miniscule errors in the way we calculate their position here on earth. Such errors are corrected
26 on a daily basis, but, if you've got a TOT value that's off by a microsecond, it's possible that you'll end
27 up with a GPS location that's slightly off. Again, though, we're usually talking about no more than a few
28 feet, if not inches. And the fact that there are usually more than four satellites connected to a receiver at
29 any given time makes this a *really* remote possibility, although it is theoretically possible.

30 Second, we've got to keep in mind that, in this case, the receiver I was tracking wasn't in a static
31 position; it was moving. That adds another layer of complication, because the continuous movement you
32 see when you open your "Maps" app on your smartphone when you're riding in a car is actually a little
33 misleading. In that case, the GPS system isn't tracking your location on a continuous basis; rather, it's

1 collecting a series of data points over time that happen to be close together. What's key here is that the
2 software underlying the program isn't just doing retrospectively. Instead, it's using that data—as well as
3 artificial intelligence—to *predict* where it thinks the receiver will go next. Take a simple example: if you
4 detect a receiver at one point on a road at 11:45:30, and then the receiver moves 100 feet east on the same
5 road at 11:45:31, the system is going to predict that the receiver will be 100 feet further east on the same
6 road at 11:45:32. Sometimes, this can lead to small errors. Take the same example let's say you're in the
7 car and you've made a right turn at 11:45:31. For a brief moment, your "Maps" app might show incorrectly
8 that you're continuing straight, rather than turning right, because that's what the prior two data points
9 suggest.

10 Anyway, back to this case. After logging into the 4XT online system and entering the login
11 information that Detective Kress gave me, I saw a blue dot traveling northward on Interstate 17, from
12 Randolph River toward Rowe. "It's going to Rowe on the 17—get after 'em!" I yelled into the phone to
13 Detective Kress. I said I'd call back with any updates and hung up the phone. About 35 minutes later, I
14 was watching the blue dot approaching the Zell Avenue exit, just outside of Rowe. The dot appeared to
15 pass just beyond the exit, but then, it reappeared at a location on the exit ramp, off the highway. I thought
16 it might just be a temporary error with the system, but alas, the dot stopped moving there. Exhibit 1, which
17 is a screenshot of the map that I saw on the screen at that moment. I've indicated in a red marker the last
18 place on the highway that I saw the blue dot before it came to rest on the exit ramp.

19 I would have liked to try to confirm that the blue dot I saw on the screen actually was Bronnie
20 Parker, but given the information I had, I wasn't able to do that. The only real way I could have done that
21 with certainty would have been to run a geofence search, but we weren't able to acquire any sort of
22 electronic identifier unique to Bronnie that would have allowed us to do that. Our best bet would've been
23 Bronnie's personal email address, but we weren't able to locate that.

24 Regardless, in my expert opinion, the data I viewed while watching the blue dot on the 4XT online
25 system compels the conclusion that the car exited the highway at Zell Avenue, rather than continuing
26 along the highway. True, the blue dot did appear briefly at a point beyond the exit, but that's likely due to
27 the predictive technology I discussed above; after all, the car had been moving continuously northward on
28 Interstate 17 for about 30 or so minutes beforehand, and, in my experience as a coder, I'd say it'd be natural
29 for that or any other software program that incorporates predictive technology to predict that the car would
30 simply continue along on the same road. To be fair, I can't say exactly how it got to the place where
31 Detective Kress ultimately found it. Given the data I saw on the screen, it's possible, I suppose that a
32 driver threw it out of the window while continuing along the highway. But, in that case, it's likely that I
33 would've seen the blue dot move once or twice along the exit ramp as it bounced down the pavement. The

1 data is much more consistent with a scenario in which the driver exited the highway, slowed down, and
2 simply dropped the device out of the window. Plus, I'm not sure about you, but think about how far a
3 throw that would've been—I certainly couldn't have done that!

4 I did submit a geofence search warrant to Google for any accounts that were present at both
5 robberies, but it was of no investigative use. First, Google didn't respond to the search warrant until about
6 a week ago. They are always so late, claiming they don't have the resources to respond in a timely manner,
7 which seems pretty sketchy. Second, Google said there weren't any devices that were present at both
8 robberies. This is not that unusual. You always hope for a home run with a geofence warrant, but people
9 are a lot better these days about controlling their location settings on their mobile devices. I was hoping
10 that we would find Bronnie's cellphone when Bronnie was arrested, but we were never able to find one.
11 (Often the phone will have more location information than we can glean from Google.) I couldn't do
12 anything else because I didn't know Bronnie's phone number, email account, or anything else that would
13 allow me to seek more location information. So that was all pretty much a dead end.

14 I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear
15 or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain all
16 relevant testimony, and I followed those instructions. I also understand that I can and must update this
17 affidavit if anything new occurs to me until the moment before I testify in this case.

18 *s/Allie Pinkerton* _____
19 Allie Pinkerton
20 Dated: October 4, 2021

21
22 Subscribed and sworn before me on October 4, 2021.

23 *s/Roberta Bost* _____
24 Roberta Bost
25

DEFENSE WITNESS STATEMENTS

1 **AFFIDAVIT OF BRONNIE PARKER**

2

3 Uh, hello. My name's Bronnie Parker, and I'm 37 years old. I live in Dullsville near the baseball field.
4 There's really not much to tell about me, I guess. I was born in Rowe and graduated from Hamilton
5 High School back in 2002. Back then, I was interested in two things, playing baseball and music. I was a
6 pretty good pitcher, some scouts checked me out, but music was my real passion. So, when I graduated, I
7 figured I'd try to join a band. I'm a bass player, so I figured it'd be easy. (We're supposed to be in high
8 demand, you know?) As it turned out, though, the first few years were kinda rough; I waited tables, worked
9 odd jobs, and did my best to save money while I was looking for a permanent gig. I have to say, I hated
10 being constantly short of cash. I ended up having to borrow money a few times from my friends, and on
11 more than one occasion, I ended up "forgetting" to pay the money back. The thought of being such a
12 deadbeat still makes me sick to my stomach, but, at the time, I didn't really have any other options. Still,
13 nobody likes a deadbeat.

14 In 2005, I finally landed a permanent place in a rock band called "Marlo Hubbard and the New-
15 Age Knuckleheads." It was led by a guy named Marlo Hubbard, who, in retrospect, was a real piece of
16 work. Marlo imagined himself—and yes, these were his exact words—as "Don Felder reincarnated." I
17 reminded him often that Don Felder wasn't actually dead, but Marlo didn't seem to let that minutia bother
18 him. In one respect, though, Marlo's image of himself was spot-on: he was a tried-and-true egomaniac,
19 and it led to dysfunction that would make the Eagles look like a bunch of Gregorian monks by comparison.
20 Marlo basically exercised dictatorial control over every aspect of the band; he chose the songs, picked the
21 gigs, decided who got to solo, and—most irritatingly, to me—controlled the money. As if that wasn't
22 enough, he was always needling me with jokes about bassists, which definitely aren't funny. ("What do a
23 bassist and a lawsuit have in common? Everyone feels a lot better when the case is closed!") My last straw
24 came when, following a gig, Marlo tried to dock my pay because he thought I had been out of tune for the
25 second half of the show. I was already making peanuts, and I more or less snapped. "Marlo," I yelled,
26 "I'm not going to let you take any more money out of my pocket!" At that point, I'm ashamed to say,
27 Marlo and I got into a bit of a scuffle. I gave it to him pretty good and was able to lift a couple of twenties
28 out of his wallet before I stormed out of the theater; I figured I earned a parting bonus, and, in any event,
29 it was what I was owed before Marlo cut my pay.

30 Anyway, that was pretty much the end of my music career. By 2009, I was still living in Rowe,
31 waiting tables and working odd jobs, and still just barely scraping by. I figured it was time for a change,
32 so I packed up what little I had and drove to Coho City. After a week or two in a motel, I found an

33 apartment, and a few weeks after that, I found a job as a landscaper at the Coho Community Association.
34 It was hot, hard work, but I enjoyed being outside and liked working with my hands. At night, I attended
35 computer security classes at Coho Community College, and I ended up earning my Associate's degree in
36 that field in 2014. A few weeks after that, I got a job at Dewing Security, a small company based in Coho
37 City that installs and manages security systems across the state. After years of living paycheck-to-
38 paycheck, things were finally looking up for me!

39 As a Dewing technician, I had a regular rotation of companies at which I'd perform periodic
40 inspections. One of those companies was Coho Community Bank, a small place with branches in both
41 Dullsville and Randolph River. During my first few years as their security specialist, I got to know Lolo
42 Baldwin, the bank's manager, reasonably well. I liked Lolo well enough, I suppose, but, in my opinion,
43 Lolo is definitely a penny-pincher—and is willing to shade the truth if it can help Lolo make an extra
44 buck. More than once, I've performed services or installed upgrades at the bank that Lolo has verbally
45 approved in advance. Then, when my office would get the bill, Lolo would tell us that Lolo didn't approve
46 those expenses and wouldn't be paying for them, even though Lolo knew perfectly well that the bank
47 owed us the money. Speaking of which, I don't remember ever suggesting to Lolo that the bank install a
48 new security system, much less scheduling any such installation, but frankly I'm surprised Lolo would
49 have agreed to it, on account of Lolo's aversion to spending money. Regardless, scheduling the
50 installation sounds like something I might have done, I guess—I had regularly done it with other
51 customers—but I just don't recall ever doing it with Cascade County Bank.

52 Still, Lolo isn't all bad. Back in 2018, I had just finished up an inspection at the bank and popped
53 my head into Lolo's office. See, I had finally saved up enough money for a down payment on a house; it
54 had been my dream to own a home since I arrived in Cascade County, and I had recently found this
55 wonderful little property near the city park in Dullsville. It was small, but it was (and is) my dream house!
56 It has two bedrooms, a wonderful kitchen, and a great deck that backs up to the baseball field. Even better,
57 it's a short walk, like maybe ten minutes, to my favorite coffee shop, Keira's Yogurt and Coffee. I go
58 there just about every morning to get my day going.

59 I needed a mortgage to finance what the down payment wouldn't cover, so I asked Lolo if the bank
60 would be able to help. When I popped the question, Lolo smiled and said, "Sure! Come have a seat, and
61 we'll see if we can figure something out." I gave Lolo my personal information, and Lolo ran a credit
62 check right then and there. I thought I saw Lolo frown for a moment, but Lolo's face quickly brightened.
63 "Look," Lolo said, "your credit isn't exactly stellar, and so this isn't something we'd normally do, but for
64 you, we'll make an exception." Lolo concluded with a wink and a grin: "Just don't make me look bad." I
65 signed the paperwork the next day, and before I knew it, I was living in my dream home. I had never been

1 happier! Finally, I felt like I had made something of myself, and I was living my American dream, you
2 know?

3 Things went fine for a while. The money I was earning from Dewing was good, and I made my
4 monthly payments each month on time and in full. In late 2020, I even started a DIY construction project
5 to expand my back deck. In January, though, I got blindsided. Just after the new year, my boss Amy
6 Jamieson called me into her office and delivered what turned out to be horrible, shocking news: Dewing
7 Security was firing me, effective immediately. I couldn't believe it! "Wh... I... Why?" I stammered.
8 "We've received a report that you've been embezzling money from us," Amy replied coldly. "We're just
9 going to let it go but suffice to say this isn't going to work out any longer. Please go and collect your
10 things from your cube." Still in shock, I stumbled out of Amy's office. What she was telling me was
11 absolutely, positively untrue. I had never stolen anything from anybody, and, to this day, I have no idea
12 why I was let go. As I trudged into the parking lot with my things, I felt tears welling up in my eyes. My
13 mind wandered pretty quickly to my house, and to my mortgage. What was I going to do?

14 I had spent most of my savings on the materials I needed for my new deck, and, if I still wanted to
15 eat and pay the utility bills, I had enough money left for one month's mortgage payment. I paid the
16 February payment, but come March, I just couldn't scrape enough together. I was trying as hard as I could
17 to get a new job, but since I obviously wasn't going to get a reference from Dewing, my options were
18 limited. March, April, and May passed, and I didn't make my payments. In retrospect, I wish I had reached
19 out to the bank to talk things through—Lolo had been so kind to me, I now feel like maybe I owed Lolo
20 that—but I was just too embarrassed to pick up the phone. Plus, in May, the phone company disconnected
21 my landline for non-payment of my monthly fees, which is the only number I had given to the bank. I still
22 had a Google "Android" cellphone, so I didn't think it was a big deal to lose the landline. You can't get
23 by these days without a cellphone, and I take it everywhere with me. But I don't pay too much attention
24 to it or the settings on it. I know "big data" and the government can track me regardless of what I do, so I
25 don't worry too much about it.

26 Sometime toward the end of May, I heard a knock on my door, and when I answered, it was Lolo.
27 Lolo asked if everything was okay, in response to which I explained that I had lost my job and was going
28 through a bit of a hard time. Lolo asked if I'd be able to resume payments soon, and I said I'd do my best.
29 Lolo smiled and said, "Look, Bronnie, this can't go on forever, but we're going to find a way to figure
30 this out. Just don't worry." Lolo definitely didn't say anything about a July 1st deadline. Following Lolo's
31 visit, I remember feeling reassured in a way I hadn't in months; I was having a tough time, but Lolo and
32 the bank were looking out for me.

33 That was the last I heard from Lolo until I was arrested. I definitely didn't see the letter shown in

1 Exhibit 4 until the state produced it in discovery in this case, and I wasn't aware that the bank was going
2 to begin foreclosure proceedings on August 13th if I didn't pay. After all, Lolo had made it sound like the
3 bank was going to take care of me. Maybe the letter was in my mailbox, but I don't check my mail that
4 often—I try to do everything electronically—and I'm positive I didn't see it until sometime in November
5 or December.

6 Still, by August, I was starting to feel worse and worse about my mortgage situation. Lolo had
7 shown me good faith, and I wanted somehow to return the favor. I tried to go and talk to Lolo on the 8th,
8 but it wasn't until I got to the bank that I realized it was closed. I didn't like it, but eventually, I knew what
9 I had to do: I would sell my car and get current on my mortgage payments, even if I still didn't know how
10 I was going to make the rest of them. I had held off on selling the car because I really needed a way to get
11 around—I live in what's known as a "food desert," and it's a three-and-a-half-mile hike from my front
12 door to the nearest grocery store (thanks a lot, Amazon!)—but I figured I was out of options. I put an ad
13 on Craigslist on the morning of August 9th, and within an hour I had a buyer. The car wasn't anything
14 special—it's an old, 1991 Lincoln Town Car—but I was able to get \$5,000 for it, which is about double
15 the bluebook value. (The car, by the way, was dark blue, not light blue.) I don't remember the name or
16 anything else about the person who came and bought it, other than that he paid cash, small bills which
17 was definitely annoying, and said he was a collector. I guess I forgot to give him the title, but he didn't
18 ask, so I figured it wasn't a big deal.

19 I was feeling pretty good at that point, so, later that day, I decided to head up to Chalmer's Casino
20 near Rowe to see whether I could turn my five grand into a little more. I've been playing poker since my
21 music days, and, at risk of sounding like I'm bragging, I'm really good. Since I didn't have my car
22 anymore, I took a bus up there and arrived around 4:30. I remember chatting with Pat Hurst in the cage
23 before I hit the floor, and I told Pat that I had just sold my car. I wasn't going to risk all my money, so I
24 only decided to play with \$2,000. That's way more than I usually would play with—I usually limit myself
25 to a few hundred bucks at the most—but, like I said, I was feeling good. I had a great night and came away
26 with something like three or four grand. I gave Pat my chips and asked for my money back in cash. (I was
27 thinking about opening a new bank account and wanted to be able to make a cash deposit for that purpose.)
28 I then took a bus home. Other than Pat, the poker dealer and the guy who bought my car, I didn't see or
29 talk with anyone else that day.

30 I had been planning on making my mortgage payment the next day but given how well I had done
31 at the casino, I was wondering whether I could make even more money at the poker table before doing so.
32 Sure, it was a dumb idea, but hindsight's 20-20, you know? The next day, I sat around the house and
33 worked a bit on the deck—I didn't see or talk to anyone all day—and the next day, August 11th, I decided

1 to take a late morning bus back up to Chalmer’s Casino. I got there right when they opened at noon. That
2 was a little unusual for me, but I was unemployed, so it’s not like I had anything else to do. I followed the
3 same routine as before; I played about \$2,000, did relatively well, and a few hours later decided to cash it
4 in at about \$3,000. I don’t remember what I talked about with Pat when I was trading in my chips, other
5 than mentioning something about needing to pay back the bank and asking that Pat issue me a check for
6 \$5,212.14 that I could give to the bank. (That was the amount due on my mortgage, which I had seen on
7 my most recent mortgage statement.) I gave Pat the extra cash that would go into the check, got it printed,
8 and left the casino at about 3:30 p.m. and headed home.

9 The next day, I walked down to the bank’s Dullsville branch and gave Lolo the check, which is
10 shown in Exhibit 2. Lolo seemed really happy; Lolo asked how I came up with the money, and I mentioned
11 something about the casino. I didn’t think anything of it, other than feeling good about getting current on
12 my payments. After all, why would I?

13 That afternoon, though, I received yet another shock: a Cascade County Sheriff’s Detective whom
14 I now know to be Elliot Kress showed up at my door and started asking me a bunch of really aggressive
15 questions. I don’t remember all the details, but I do remember the detective asking about a stolen car that
16 sounded like the one I had just sold. I told the detective that I had just sold a *dark* blue car, not a light blue
17 one, but the detective didn’t seem to care. I told the detective that I sold it to some guy on Craigslist and
18 that I didn’t know exactly who he was, and that I had been at home alone on both Monday and Wednesday
19 mornings. The detective was making me really uncomfortable, so at that point, I said, “Look, I really need
20 to get going. Can you tell me what’s going on?” “Not yet,” said the detective, “but you’ll find out.” That
21 irritated me; I shut the door in the detective’s face.

22 Next thing I know, I’m in handcuffs. I know some of the facts look bad but let me say in no
23 uncertain terms that I had nothing to do with the two robberies, which I read about in the newspaper. I just
24 hope I can clear my name.

25 I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear
26 or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain all
27 relevant testimony, and I followed those instructions. I also understand that I can and must update this
28 affidavit if anything new occurs to me until the moment before I testify in this case.

29 *s/Bronnie Parker*

30 Bronnie Parker

31 Dated: December 9, 2021

32
33 Subscribed and sworn before me on December 9, 2021.

34 *s/Roberta Bost*

35 Roberta Bost

AFFIDAVIT OF PAT HURST

1
2
3 Hi there, people. Where should I begin? Oh yeah, I guess my name would be a good start: I'm Pat
4 Hurst. I'm 67 years old, and I live in Rowe, Arizona.

5 I've bounced around quite a bit over the years, I guess. I grew up in the San Francisco Bay Area.
6 My parents were big, fancy businesspeople who owned a bunch of newspapers all around the country.
7 That life really wasn't for me, though. Remember, when I graduated from Piedmont High School in 1972,
8 things were really *happening* down there. My parents wanted me to follow them into the newspaper
9 business, but the idea of leading such a starched, boring existence made me sick to my stomach. All around
10 me, people were taking it to the streets, trying to throw off the cultural shackles that had bound them for
11 generations, you know? It was totally exhilarating to me. I ended up running in a few different circles—
12 mostly social clubs, a few bands, one or two secret societies, things like that. Ever heard of the Paranoids,
13 the music group? I was their bassist for a while. What about Inamorati Anonymous? No? Well, I guess
14 the point of being anonymous is that you're not supposed to know who we are—I mean, who we were.
15 Yeah, definitely, who we were. Anyway, it was a wild time.

16 Unfortunately for me, I ended up falling in with a particularly bad crowd when I was in my mid-
17 20s. Through a friend of a friend of a friend, I ended up becoming a regular, card-carrying member of
18 Trystero, a secret society dedicated to the overthrow and destruction of all postal monopolies. (Whenever
19 we wanted to send a message, we used a network of hidden wastebins, rather than the mail. I admit, it was
20 a little weird, even for me.) Like any secret society, we needed funding for our operations, and we ended
21 up getting it by running an elaborate check-kiting scheme; we'd open small bank accounts, write one
22 check for way more than we had in the account, write another check from another under-funded bank
23 account to cover the first check, and so on. We ended up being pretty successful—over a couple of years,
24 we accumulated something like \$10,000—but, of course, what we were doing was fraudulent. Uncle Sam
25 ended up catching on, and in 1981, I was convicted following a trial of multiple counts of bank fraud. I
26 served 5 years in prison and was released in 1986. That whole thing was a sobering experience, and I've
27 been squeaky clean ever since. Still, to this day, I don't want to go near a bank if I can avoid it. I mean,
28 was what we were doing *really* all that bad? The banks were federally insured, after all, so it wasn't like
29 we were hurting anyone...

30 Anyway, after I got out, things were pretty tough. Especially back then, it was really hard for a
31 recently convicted felon to find work, so I worked lots of odd jobs. I was a gardener, a delivery driver, a
32 waiter... I can't even remember all the jobs I've had over the years.

33 In 1995, I decided it was time for a change, so I moved up to Rowe from the Bay Area and told

1 myself I needed to make a new start. That year, it turned out, was when Chalmer’s Casino opened just
2 outside of town. I started as a janitor that year. Since then, I worked my way up to the casino’s assistant
3 floor manager. They asked on the application whether I’d ever been convicted of any crimes, and this
4 time, I decided I’d simply write “no.” I’d been honest about my conviction before, and the only thing it
5 had gotten me was rejection letters. I figured I’d take a chance and see if the casino would follow up on
6 it. As far as I know, they never did, and I got the job.

7 As the floor manager, I divide my time between the “cage” and the floor itself. The cage is the
8 area where customers come to exchange their money for chips, which they can then use to play poker,
9 blackjack, and many of our other games. It’s a pretty routine job—the customer gives me the money; I
10 count it and then give them the chips—but someone’s got to do it.

11 It was primarily in the cage that I met Bronnie, who’s been a regular at the Casino since, I don’t
12 know, maybe 2011? Since then, Bronnie has visited us about once a month. Bronnie has told me before
13 that Bronnie’s game is poker—Texas Hold ‘Em, to be precise—and from what I can tell, Bronnie is a
14 really good player. A number of times over the years, Bronnie has come to the cage with only \$50 or \$100,
15 and then come back at the end of the night with \$2,000 or \$3,000 in chips. Of course, that doesn’t happen
16 every time; sometimes Bronnie more or less breaks even, and sometimes Bronnie loses money, but overall,
17 I’d say that Bronnie seems to win more money than Bronnie loses.

18 You want to know about August 9th? Yeah, I think I remember that. It was a busy night, and I was
19 alternating between the cage and the floor. At about 4:30 p.m.—which is earlier than Bronnie usually
20 comes in—Bronnie showed up at the cage with a wad of cash in a paper bag. It was a lot more than Bronnie
21 usually brings. “Wow,” I said, “looks like someone just won the lottery.” Bronnie chuckled. “No, Pat,”
22 Bronnie replied, “I just sold one of my old cars and wanted to try my luck.” I definitely counted the money,
23 but to be honest, I can’t remember exactly how much Bronnie gave me. (I count cash like that dozens of
24 times every night I’m working, and it all bleeds together pretty easily.) It could’ve been as little as \$2,000,
25 and it could’ve been as much as \$2,500, somewhere in between there. I do remember, though, that it was
26 mostly twenties and fifties that Bronnie gave me, along with a few fives. Bronnie seemed relaxed for the
27 whole interaction; if you had told me that Bronnie had just robbed a bank, I’d be surprised. Bronnie was
28 wearing blue jeans and a t-shirt. (I didn’t see Bronnie’s shoes.) There were *plenty* of people there on the
29 floor that night wearing dark hoodies; after all, it’s a pretty good way to protect your poker face.

30 Bronnie grabbed Bronnie’s chips and headed straight to the poker table. I didn’t see Bronnie again
31 until later in the evening, when Bronnie came back to cash in Bronnie’s chips. I *do* remember counting
32 those—they’re much easier to count than cold, hard cash. Bronnie’s take-home added up to a little over
33 \$3,000. “Good going, my friend! Looks like you won some,” I said absentmindedly. “Yeah,” Bronnie

1 replied, “it was a good night.” Bronnie still seemed relaxed; the whole evening had been perfectly
2 ordinary, as far as I was concerned. “How do you want your money?” I asked. “Can you do it in cash?”
3 Bronnie asked. I counted out the money mostly in fifties and gave it to Bronnie.

4 I saw Bronnie again on August 11th. I remember that day a little more clearly because Bronnie
5 came in at about 12:15 p.m., right after we opened. Bronnie was the first person up at the cage, again with
6 a paper bag full of cash. I was a bit taken aback, only because Bronnie had just been in the previous
7 Monday and, as far as I can remember, has never come in this early. “What gives?” I asked. “Oh, it’s my
8 day off,” Bronnie said with a shrug. “Thought I’d try my luck again, seeing as how well I did last time.”
9 I counted the cash, but, again, I don’t remember exactly how much Bronnie gave me—only that it was
10 somewhere between about \$4,000 and \$5,000 and that it was mostly in twenties and fifties, with a few
11 fives thrown in for good measure. “You sell another car?” I asked while I was counting. “No,” Bronnie
12 said with a chuckle, “this is just the rest of what I got for the first one.” As on the 9th, there were a few
13 people who came in later in the afternoon wearing dark hoodies. From what I remember Bronnie was
14 dressed similarly to the previous visit, jeans, t-shirt, but this time Bronnie was also wearing a hoodie, dark
15 hoodie I believe.

16 Bronnie came back an hour or two later with Bronnie’s chips, which I counted, and which
17 amounted to something just under \$5,000—I don’t remember precisely. “How do you want it?” I asked.
18 Bronnie paused, and a sad look seemed to come over Bronnie’s face. “Look,” Bronnie said, “I was kidding
19 you, earlier. I actually lost my job a while ago, and I’m behind on my mortgage. The car was the last thing
20 I had, so I really need to pay the bank. If I give you the rest in cash, can you make out a check to Cascade
21 Community Bank for \$5,212.14?” “Sure,” I said. Bronnie gave me the rest—mostly in what looked like
22 the same fifties I had given Bronnie on Monday—and I made out the check. “Thanks, Pat,” said Bronnie
23 plaintively. “You’re a real friend.” As on Monday, Bronnie seemed relaxed for our entire interaction.

24 I later read about the bank robberies in the Coho Chronicle, but if you ask me, I don’t think Bronnie
25 is the one who did them. Bronnie seemed totally calm on both nights; I mean, how would you be if you
26 had just robbed a bank? If anybody’s robbing anybody, it’s the bankers themselves. I’ve had a mortgage
27 with that same bank since 2002, and I can’t believe how high my monthly payments are. The way I see it,
28 it’s them who’ve been robbing me for 20 years.

29 I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear
30 or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain all
31 relevant testimony, and I followed those instructions. I also understand that I can and must update this
32 affidavit if anything new occurs to me until the moment before I testify in this case.

33 s/Pat Hurst

Pat Hurst

Dated: October 26, 2021

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Subscribed and sworn before me on October 26, 2021.

s/Roberta Bost
Roberta Bost

AFFIDAVIT OF DOLRAY MAPP

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Hello! My name is Dolray Mapp. I live in Coho City. I'm 44 years old, and I work as a private investigator. I was hired by Bronnie Parker's defense team to conduct an investigation into the bank robberies that took place on August 9th and August 11th. In my opinion, given the shoddy work by the Cascade County Sheriff's Office (the "CCSO"), I'm really the first person to meaningfully investigate these robberies.

I grew up in Coho City and attended the University of Arizona, where I studied criminal justice. When I graduated in 1999, tech companies were hiring everyone they could. You didn't even need a background in computer science to get a good-paying job at one! So, I started my career as a designer at MapQuest in 1999. It was really exciting being at the forefront of computer mapping and navigation, but I didn't work on any code or anything. I mostly worked on the look and "feel" of the site. We were all thrilled the next year when AOL bought us out, but the good times didn't last, and I was let go when the tech bubble burst in 2001. It was tough at first, but I realized that my termination had been a blessing in disguise when I found my true calling — being an investigator for criminal defense lawyers. I opened my own investigative agency in 2002, and I've worked there ever since.

Over the years, I've taken a number of continuing education courses at Coho Community College on GPS and location technology, which comes up in my work more often than you might realize. I also have a certification in GPS and location technology from the Defense Institute of Continuing Education, which I obtained in 2016. I've worked on dozens of cases and have previously testified as an expert witness in both state and federal court on GPS and location technology (among many other subjects). I've always testified for the defense. Maybe I just like rooting for the little guy, you know?

Bronnie Parker's attorneys showed me the affidavit of Allie Pinkerton, who I understand to be a computer forensic specialist with the CCSO and asked me to comment on Allie's conclusions. I cannot question Allie Pinkerton's general mode of analysis, but I don't agree with the ultimate conclusion that the robber's car must have exited the freeway at Zell Avenue. Now, to be fair, I haven't actually been to the location where the tracking device was found, but it just seems odd to me that you could make any conclusion as to whether the device was thrown from the freeway or dropped out of the window on the exit ramp; in my experience with GPS technology and based on the readings that Allie describes in Allie's affidavit, either scenario is equally possible. Allie's conclusion is definitely not one that I think is based on any kind of peer reviewed analysis or scientific method. No offense to Allie, but, in my opinion, Allie's conclusion is nothing more than conjecture.

1 The way I see it, because the tracking data on which the government relied doesn't tell us very
2 much—including, most importantly where Bronnie was at the time of the robberies—I decided that I
3 needed more information. So, I asked Bronnie if Bronnie had a cellphone. Bronnie told me that Bronnie
4 had an Android device, which is great. See, anyone with an Android device is automatically connected to a
5 Google account. So, depending upon the privacy settings you have setup on your phone, Google can and
6 will collect location information on your device anytime you access a Google service. Heck, sometimes it
7 will collect location information even if you're not explicitly using a Google App, like it will collect that
8 information in the background of your device. (By the way, this doesn't apply just to phones with the
9 Android operating system. If you have an Apple device on which you've installed a Google app, Google
10 can collect your location information in that way, too.) What's the upshot of all that? Well, if you know
11 where to look, a savvy investigator can use location data from Google to "break a case wide open," as they
12 say. I remember one case years ago in which I used location data not only to prove that my client was not
13 guilty, but also to help the police find and arrest the true culprit. Now that's what I call a win-win!

14 When it comes to location data, though, it's important to know that the technology is generally very
15 reliable but not foolproof. The location data we get from Google tells us only that the user's device sent
16 information to Google at a particular time and from a particular location—but not that the device's user
17 *actually* was present at that location at that time. "Virtual private networks," for example, can mask a
18 user's real location by hiding the user's real IP address (from which a user's location is sometimes
19 determined). That said, Bronnie had no such software installed on Bronnie's phone, which I inspected.

20 Now, I understand that Allie Pinkerton sent a search warrant to Google directing it to provide
21 information on any Google accounts associated with devices that, according to any saved location data,
22 were present at the times and locations of *both* robberies. I must applaud Allie Pinkerton on the narrowness
23 of the request; some investigators would have sought information concerning devices present at *either*
24 robbery, which would lead to the collection of a huge number of innocent people's location information.
25 As Allie testified in Allie's affidavit, they got no results in response to that request. That, I think, is an
26 indication that Bronnie is not the robber, because Bronnie told me that Bronnie always carries Bronnie's
27 phone. But I didn't want to stop there; I wanted to see if I could prove Bronnie was somewhere else at the
28 time of the robberies.

29 I decided to go straight to the source: I wanted to see if Google could tell us where Bronnie Parker
30 actually *was* at the time of the robberies. Bronnie told me that Bronnie's email address was
31 "br0nni3@gmail.com," and that Bronnie's password was "dillinger1934." I was a bit puzzled by this and
32 asked Bronnie why, but Bronnie just laughed and said, "I guess I'm just a history buff. I change my
33 password all the time for security reasons, so it's only been that for a day or so."

1 Anyway, using that information, I accessed Bronnie’s Google account. Because of a couple of new
2 data protection laws, Google now is required to allow users to access and download all their personal
3 information. I downloaded the data and reviewed Bronnie’s location information from the mornings of
4 August 8, 9, 11, and 12, 2021. (I included a day before the first robbery and a day after the second robbery
5 just for context.) I then filtered the data such that it included only information related to the immediate
6 surroundings (a few blocks) of the two robbery locations. There was a lot of other location data showing
7 Bronnie elsewhere, like at Chalmer’s Casino, but I didn’t bother analyzing any of that information because
8 I didn’t think it was important. I was just focused on any location data near the robberies around the time of
9 the robberies. That information provided sufficient facts and data for me to form an opinion concerning
10 Bronnie’s whereabouts around the time of each robbery. My evaluation in that regard was based on reliable
11 principles and methods applicable to virtually all types of location data analysis, all of which I have applied
12 reliably in this case.

13 I began by considering the Randolph River robbery. That part of my analysis was straightforward:
14 none of the location data I reviewed showed Bronnie near Cascade Community Bank’s Randolph River
15 branch around the time of the robbery on August 11th. In fact, none of the data suggested that Bronnie had
16 been anywhere in Randolph River on any of the four days I examined.

17 The Dullsville Robbery was a slightly different story, although in the end it showed the same thing:
18 I examined the data, and lo and behold, none of it showed Bronnie at the site of the robbery in Dullsville on
19 August 9th, either. There was, however, location data showing Bronnie in other parts of the Dullsville area
20 on each of the four days I considered. I plotted those points on a map, which is shown in Exhibit 5.

21 Now, by itself, does this data prove beyond all doubt that Bronnie wasn’t the robber? No. It’s
22 theoretically possible that Bronnie could have turned off Bronnie’s phone or the phone’s “location
23 services” function; it’s also possible that Bronnie simply did not connect to any Google services at the time
24 of the robberies. In any of those cases, Bronnie’s location data wouldn’t track Bronnie’s actual movements.
25 But, in my opinion, the location data we have makes it unlikely that Bronnie is the robber. First, Google
26 tracked Bronnie’s location when Bronnie was at the Dullsville branch on August 8th and 12th, and also
27 tracked certain of Bronnie’s other movements, so I can say with certainty that Bronnie does allow location
28 tracking, at least sometimes, on Bronnie’s device. Further, I know that Google makes it very, very difficult
29 to manage your privacy settings, especially when it comes to third-party apps. I have read many peer
30 reviewed studies showing that, over the years, Google can continue to track your location even if you think
31 you have turned off certain location settings. On top of all that, I just don’t think Bronnie ever would have
32 turned off Bronnie’s phone. I guess I can’t really say why Bronnie would have had Bronnie’s phone on at
33 all times, but it’s just my hunch, having talked to Bronnie a few times.

1 I'm so confident in my opinion that I was hoping to resolve this case short of trial. To that end, I
2 presented the evidence discussed above, as well as Exhibit 5, to Detective Kress, but Detective Kress just
3 blew me off. "Look Dolray," Detective Kress grumbled, "I don't need your help in my investigation. I've
4 been doing this a long time, and I know a criminal when I see one." I was bothered by that statement, and it
5 only confirmed my suspicion that Detective Kress's investigation was troubled from the start.

6 I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear
7 or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain all
8 relevant testimony, and I followed those instructions. I also understand that I can and must update this
9 affidavit if anything new occurs to me until the moment before I testify in this case.

10

s/Dolray Mapp

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Dolray Mapp

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Dated: October 29, 2021

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14 Subscribed and sworn before me on October 29, 2021.

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s/Roberta Bost

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Roberta Bost

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EXHIBITS

EXHIBIT 1: Bank GPS Location Map

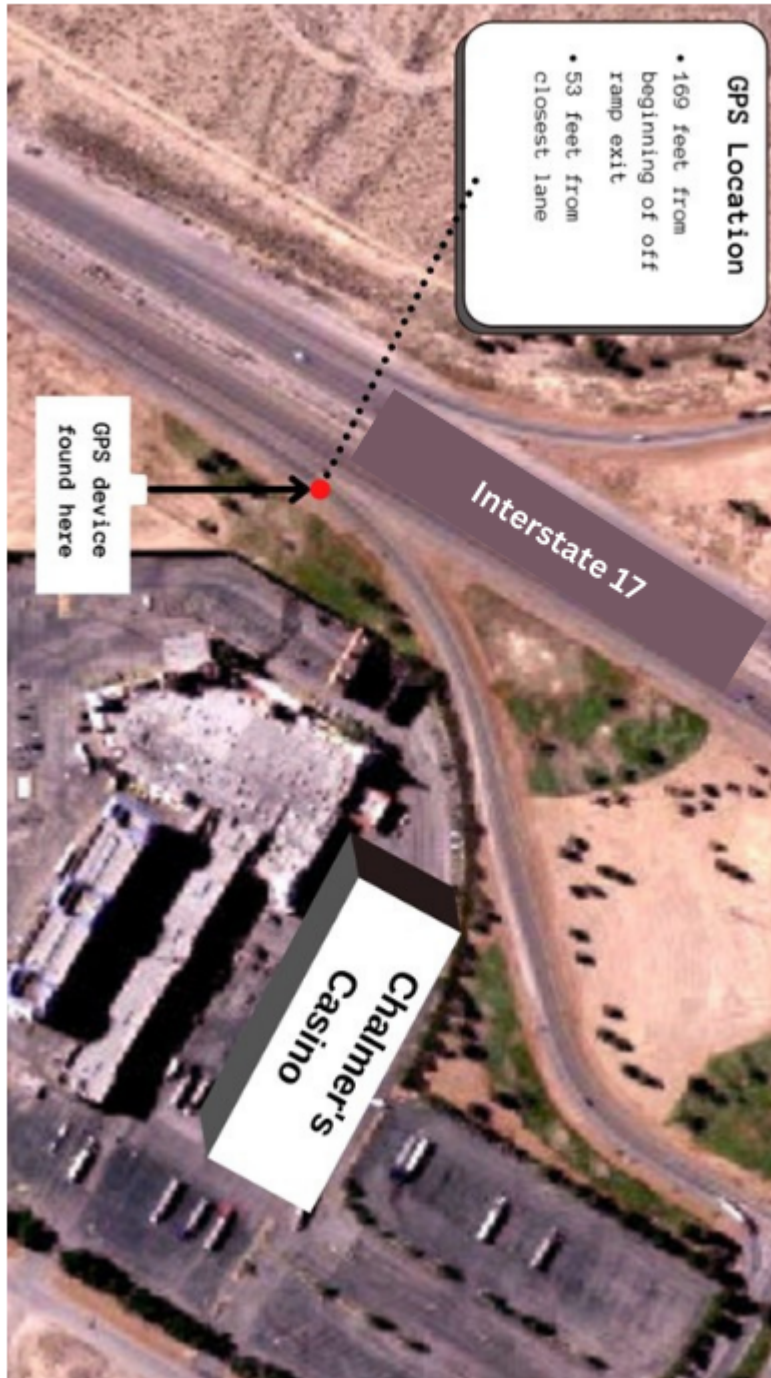


EXHIBIT 2: Parker's August Mortgage Check

CHALMERS CASINO LLC 400 Zell Avenue Rowe, AZ 86201	208 12-3458/1215-3031 
	<u>11 August 2021</u> Date
Pay to the Order of <u>Cascade Community Bank</u>	\$ 5,212.14
<u>Five thousand two hundred twelve and 14/100</u> Dollars	 Security Features Details on Back
Cascade Community Bank www.cscdecommbrk.com	
For <u>Mortgage</u>	Pat Gurst MP
 Redacted (CCSO)	

EXHIBIT 3: Parker's Car Title

ARIZONA VEHICLE CERTIFICATE OF TITLE

ARIZONA DRIVER AND MOTOR VEHICLE SERVICES CERTIFIES THAT THE PARTY IS LISTED AS THE OWNER OF THE DESCRIBED VEHICLE. DOCUMENTS FILED WITH MVD SHOW THE VEHICLE IS SUBJECT THE THE OWNER ITERESTS SPECIFIED.				CONTROL NUMBER 4080021	
PLATE NUMBER 351 VGN		TITLE NUMBER 21067	PROCESS DATE 030902	SURVIVOR N/A	REFERENCE NUMBER
YEAR 1991	MAKE FORD	STYLE SED	MODEL TWNCR	COLOR BLUE	
OWNER/LESSEE Bronnie Parker 1781 Gallagher St, Apt. B Coho City, AZ 86201				ODOMETER READING	ODOMETER DATE
				ODOMETER MESSAGE	
				<p style="text-align: center;">TITLE BRANDS</p> <p>The title "Brand" printed below indicates the history, condition, or circumstances of the vehicle for which this title has been issued. Please see back of title for more information.</p> <p style="text-align: center;">- NONE -</p>	
USE THIS SECTION WHEN THE ONLY CHANGE IS TO REMOVE A SECURITY INTEREST. FOR ANY OTHER CHANGES, SEE REVERSE.					
If there is no change to owners shown above AND all security interest holders have released interest, one registered owner must sign and date here, if not completing a separate application for title. In addition, if your address has changed, cross out the old address and write the new address and county of residence on the front of the title. Mail the title and the fee to: MVD 1959 S Woodlands Village Blvd Ste B, Flagstaff, AZ 86001				SIGNATURE X _____	DATE
				To release interest in the vehicle, complete the reassignment on the back of the title.	
SIGNATURE AND COUNTERSIGNATURE OF SECURITY INTEREST HOLDER OR LESSOR RELEASING ALL INTEREST				DATE	
X _____					
SIGNATURE AND COUNTERSIGNATURE OF SECURITY INTEREST HOLDER OR LESSOR RELEASING ALL INTEREST				DATE	
X _____					
SEE REVERSE SECTION FOR APPLICATION INSTRUCTIONS.					

VOID IF ALTERED OR ERASED

VOID IF ALTERED OR ERASED

VOID WITHOUT CHAIN LINK WATERMARK

EXHIBIT 4: Dullsville Branch Mortgage Foreclosure Letter to Parker

Cascade Community Bank

Serving your needs since 1936

Main branch	Randolph River branch
1721 Harrington Ave.	880 Atwood St.
Dullsville, AZ 86201	Randolph River, AZ 85089
(928) 807-2234	(928) 674-5899

July 26, 2021

Bronnie Parker
26 Piper Lane
Coho City, AZ 85010

Dear Bronnie:

I write regarding your mortgage with Cascade Community Bank. As we have discussed, we have not received a payment from you since February of this year. Your current outstanding balance, including all applicable late fees, is \$5,212.14.

Regrettably, if we do not receive payment in full by August 12, 2021, we will have no choice but to initiate foreclosure proceedings the following day.

If there is any way in which we might assist you in paying down your balance, please let us know as soon as possible. On behalf of all of us at Cascade Community Bank, I wish you all the best.

Sincerely,



Lolo Baldwin
Manager, Cascade Community Bank



EXHIBIT 5: Area Map - Parker's Google Location Data