

SECOND UPDATE MEMORANDUM
2025 ISBA High School Mock Trial Invitational

People v. Reed

1/27/2025

Question No. 1. [This is a collective answer to more than one submitted question].

Both doctors talk about testing for alcohol and even say the exhibits will support their findings, but when you look at the exhibits (3 and 6) there's nothing about testing for alcohol. All the tests that were taken are listed and alcohol is not one of them. Is this intentional or a mistake?

We noticed that in both Dr. Casey Robin's affidavit and Dr. Jamie Cruz's affidavit, there was mention of alcohol in Victor Chase's system, as seen by the Toxicology report. (Dr. Casey Robin, 69-71. Dr. Jamie Cruz, 49-51) The toxicology report, however, never mentions any trace of alcohol in Victor Chase's system. Was this purposeful or an error?

Answer: The problem will stand as written.

Question No. 2. [This is a collective answer to more than one submitted question].

Is there a typo in the police report? Exhibit 7 states: "I took a total of photographs...." What is the number of photographs that Officer Alex Morgan took?

Answer: This is an inadvertent typographical error. Exhibit 7 should state: "I took a total of **four** photographs..."

Question No. 3. In the second sentence in [Exhibit 7], Officer Morgan says, "Photographs also include the general layout of the mansion, showing the scattered condition of the property." Which of the photos among the available exhibits did Officer Alex Morgan take?

Answer: Officer Morgan took all the photographs provided in the exhibits.

Question No. 4. In pretrial order #12, are the two numbers (15 and 57) switched?

Answer: See Answer to Question No. 3 of First Update Memorandum.

Question No. 5. On page #9, in the jury instructions, the definition of aggravated battery reads "A person commits the offense of aggravated battery when they UNLAWFULLY deliver Fentanyl to another...", and in the first proposition in the

following Issues section it requires "That the defendant KNOWINGLY delivered Fentanyl to another person..." - are these different on purpose?

Answer: The problem will stand as written.

Question No. 6. Exhibit #13 refers to a note log within the toxicology report but that log isn't provided. Will we be provided with this report/log?

Answer: The problem will stand as written.

Question No. 7. In the interview section of the report marked as Exhibit 7, it states that the anonymous party goer stated that Reed knew the brownies were laced with fentanyl, but in the next sentence he/she says that Reed was participating in the party casually with little indication of knowledge of any dangerous substances. These statements contradict each other. Is this written as intended or an error?

Answer: The problem will stand as written.