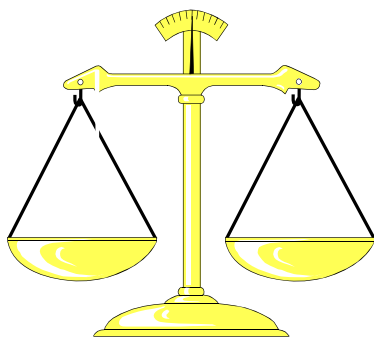


# **CASE MATERIALS**

Official 2009 Mock Trial Materials  
for the  
**TWENTY-NINTH ANNUAL  
UTAH LAW RELATED EDUCATION  
MOCK TRIAL PROGRAM**

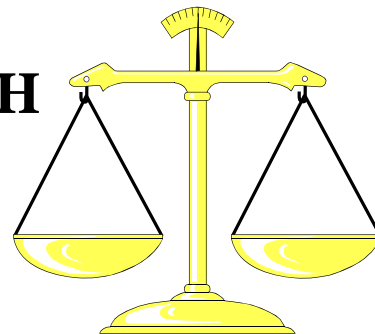
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**STATE OF UTAH**

**v.**



**CASEY CAMPBELL**

**Case No. 09cr36912**

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Oregon Mock Trial Program  
Rewritten and Adapted to Utah Law by  
Michelle M. Roybal and Kathi Sjoberg



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IN THE TWELFTH JUDICIAL DISTRICT COURT OF PARK COUNTY  
STATE OF UTAH

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**STATE OF UTAH** : **INFORMATION**  
Prosecution,  
vs.  
**CASEY CAMPBELL,** : Case 09cr36912  
Defendant.

---

The undersigned prosecutor states on information and belief that the defendant, on or about April 4, 2008, at Park County, State of Utah, committed the crimes of:

**COUNT ONE**

**ATTEMPTED AGGRAVATED MURDER** §76-4-102 and §76-5-202(1)(n), a first degree felony, as follows: That at the time and place aforesaid the defendant did intentionally or knowingly attempt to cause the death of another by means of any weapon of mass destruction.

**COUNT TWO**

**POSSESSION OF WEAPON OF MASS DESTRUCTION** §76-10-402, a first degree felony, as follows: That at the time and place aforesaid the defendant did, without lawful authority, intentionally or knowingly manufacture, possess, deliver, display, use, or attempt to use a weapon of mass destruction.

**COUNT THREE**

**POSSESSION OF A DANGEROUS WEAPON ON OR ABOUT SCHOOL PREMISES** §76-10-505.5, a class B misdemeanor, as follows: That at the time and place aforesaid the defendant did possess a dangerous weapon at a place the defendant knew or had reasonable cause to believe was on or about school premises.

PROBABLE CAUSE STATEMENT: The undersigned prosecutor is a Deputy Park County Attorney and has received information from the investigating office, Detective Riley, and the Information herein is based upon such personal observations and investigation of said officer.

On April 4, 2008, Detective Riley received an anonymous call of a suspicious container at the Park Lane High School. Upon investigating, Detective Riley found a weapon of mass destruction. Defendant was seen in the area where the weapon was found prior to it being discovered. Witnesses stated that defendant had made threats towards another individual. Further evidence of said threats were located in defendant's possession. Materials used in construction of the weapon of mass destruction were located in defendant's garage.

Authorized \_\_\_\_\_  
For presentment and filing:

PARK COUNTY ATTORNEY

By \_\_\_\_\_  
Deputy Park County Attorney

Presented and filed this \_\_\_\_ day of \_\_\_\_\_, 2008.

\_\_\_\_\_  
CLERK

## LEGAL AUTHORITIES

### Utah Code Annotated

#### **Section 76-4-101. Attempt -- Elements of offense.**

- (1) For purposes of this part, a person is guilty of an attempt to commit a crime if he:
- (a) engages in conduct constituting a substantial step toward commission of the crime; and
  - (b)(i) intends to commit the crime; or
  - (ii) when causing a particular result is an element of the crime, he acts with an awareness that his conduct is reasonably certain to cause that result.
- (2) For purposes of this part, conduct constitutes a substantial step if it strongly corroborates the actor's mental state as defined in Subsection (1)(b).
- (3) A defense to the offense of attempt does not arise:
- (a) because the offense attempted was actually committed; or
  - (b) due to tactual or legal impossibility if the offense could have been committed if the attendant circumstances had been as the actor believed them to be.

#### **Section 76-4-102. Attempt -- Classification of Offenses.**

Criminal attempt to commit:

- (1) a capital felony is a first degree felony;
- (2) a first degree felony is a second degree felony, except that an attempt to commit any of the following offenses is a first degree felony punishable to imprisonment for an indeterminate term of not fewer than three years and which may be for life:
  - (a) murder, a violation of Subsection 76-5-203(2)(a), if the victim or another suffers serious bodily injury in the course of the actor's commission of the offense;
  - (b) child kidnapping, a violation of Section 76-5-301.1; or
  - (c) any of the felonies described in Title 76, Chapter 5, Part 4, Sexual Offenses, that are first degree felonies;
- (3) a second degree felony is a third degree felony;
- (4) a third degree felony is a class A misdemeanor;
- (5) a class A misdemeanor is a class B misdemeanor;
- (6) a class B misdemeanor is a class C misdemeanor; and
- (7) a class C misdemeanor is punishable by a penalty not exceeding one half the penalty for a class C misdemeanor.

#### **Section 76-5-202. Aggravated murder.**

- (1) Criminal homicide constitutes aggravated murder if the actor intentionally or knowingly causes the death of another under any of the following circumstances:
- (n) the homicide was committed:
    - (i) by means of a destructive device, bomb, explosive, incendiary device, or similar device which was planted, hidden, or concealed in any place, area, dwelling, building, or structure, or was mailed or delivered; or
    - (ii) by means of any weapon of mass destruction as defined in Section 76-10-401; . . . .

*Amended by Chapter 12, 2008 General Session*

### **Section 76-10-401. Definitions.**

(6)(a) “Weapon of mass destruction” means:

(i) any item or instrumentality that is designed or intended to cause widespread death or serious bodily injury to multiple victims;

(ii) any item or instrumentality that is designed or intended to cause death or serious bodily injury through the release, dissemination, or impact of toxic or poisonous chemicals, or their precursors;

(iii) any disease organism, including any biological agent, toxin or vector which is used or intended to be used as a weapon;

(iv) any item or instrumentality that is designed to release radiation or radioactivity at a level dangerous to human life and that is used or intended to be used as a weapon; or

(v) any substance or material or combination which has been prepared or altered for use in the creation of a weapon described in Subsections (6)(a)(i) through (v).

(b) “Weapon of mass destruction” does not include firearms or rifle, pistol, or shotgun ammunition, reloading components, or muzzleloading equipment.

### **Section 76-10-402. Manufacture, possession, sale, use, or attempted use of a weapon of mass destruction prohibited -- Penalties.**

A person who without lawful authority intentionally or knowingly manufactures, possesses, sells, delivers, displays, uses, attempts to use, solicits the use of, or conspires to use a weapon of mass

destruction or a delivery system for a weapon of mass destruction, including any biological agent, toxin, vector, or delivery system as those terms are defined in this section, is guilty of a first degree felony.

*Enacted by Chapter 166, 2002 General Session*

### **Section 76-10-501. Definitions.**

(5)(a) “Dangerous weapon” means any item that in the manner of its use or intended use is capable of causing death or serious bodily injury. The following factors shall be used in determining whether a knife, or any other item, object or thing not commonly know as a dangerous weapon is a dangerous weapon:

(i) the character of the instrument, object, or thing;

(ii) the character of the wound produced, if any;

(iii) the manner in which the instrument, object, or thing was used; and

(iv) the other lawful purposes for which the instrument, object, or thing may be used.

(b) “Dangerous weapon” does not include any explosive, chemical, or incendiary device as defined by Section 76-10-306.

### **Section 76-10-505.5. Possession of a dangerous weapon, firearm, or sawed-off shotgun on or about school premises -- Penalties.**

(1) A person may not possess any dangerous weapon, firearm, or sawed-off shotgun, as those terms are defined in Section 76-10-501, at a place that the person knows, or has reasonable cause to believe, is on or about school premises as defined in Subsection 76-3-203.2(1).

(2)(a) Possession of a dangerous weapon on or about school premises is a class B misdemeanor.

(b) Possession of a firearm or sawed-off shotgun on or about school premises is a class A misdemeanor.

(3) This section does not apply if:

- (a) the person is authorized to possess a firearm as provided under Section 53-5-704, 53-5-705, 76-10-511, or 76-10-523, or as otherwise authorized by law;
  - (b) the possession is approved by the responsible school administrator;
  - (c) the item is present or to be used in connection with a lawful, approved activity and is in the possession or under the control of the person responsible for its possession or use; or
  - (d) the possession is:
    - (i) at the person's place of residence or on the person's property;
    - (ii) in any vehicle lawfully under the person's control, other than a vehicle owned by the school or used by the school to transport students; or
    - (iii) at the person's place of business which is not located in the areas described in Subsection 76-3-203.2(1)(a)(i), (ii), or (iv).
- (4) This section does not prohibit prosecution of a more serious weapons offense that may occur on or about school premises.

*Amended by Chapter 203, 2003 General Session*





## STATEMENT OF FACTS

On Friday, April 4, 2008, at 12:23 p.m., Detective Rory Riley of the Park Lane City Police Department received a call on the station's anonymous tip line. The caller informed the detective that there was a suspicious container in a trash can at Park Lane High School. Detective Riley drove to the school to investigate the tip.

After informing the school's administration of the situation, Detective Riley searched the campus. In one of the trash cans located on the dining patio next to the cafeteria, a clear container holding a liquid was found. Taped around the container were a wristwatch, wires, a battery, and a metal igniter strip. Detective Riley called for back-up and the bomb squad. The school was evacuated. The next day, April 5, Detective Riley arrived at the police station early to continue the investigation of the container found at the school. Preliminary lab results identified the components of the liquid inside the container as paint thinner and Doxene, a common industrial cleaner.

At 9 a.m., Detective Riley was visited by Sawyer Simpson, a senior at Park Lane. Sawyer claimed to have information about the incident. Sawyer told Detective Riley that he/she saw Casey Campbell, also a senior at Park Lane, wandering around the dining patio before school started on Friday. Additionally, Sawyer told the detective that just last Wednesday, April 2, Casey told her/him, "You will be sorry that you ever picked on me." Sawyer said that Casey thought he/she and Sawyer's group of friends were bullying Casey.

Sawyer Simpson is a member of a group of kids at Park Lane High known by the other students as The Crew. Sawyer Simpson is the leader of this group. Sawyer found that Casey's R-Place page contained pictures of members of this group. Browsing through Casey's page, Sawyer was troubled. Among others, Casey listed pyrotechnics as an interest. Additionally, Sawyer saw a drawing of Park Lane High School on fire with a person, labeled "Sawyer", trying to get out of the burning building. Sawyer decided, based on all he/she had seen, to tell her/his parents. Sawyer's father drove Sawyer to the police station. Detective Riley interviewed Sawyer Simpson. Riley looked at Casey's R-Place page and decided that, along with Sawyer's statement, the police had enough evidence to obtain a warrant to search Casey's house. A judge issued the search warrant.

Later that day, Detective Riley searched the Campbell house. In the garage, Riley found an almost empty container of paint thinner. In Casey's room, on the wall and in notebooks, Riley found drawings similar to the one on Casey's R-Place page, as well as other art done by Casey. With the paint thinner and drawings in hand, Detective Riley arrested Casey.



**PROSECUTION WITNESS STATEMENT**  
**DETECTIVE RORY RILEY**

1 My name is Rory Riley. I am 37 years old and have been working for the Park Lane city  
2 police department for the last 13 years. The morning of April 4, 2008, had been pretty slow. I had  
3 spent a few hours finishing up some reports when the Captain walked by and asked me to handle  
4 the tip line. I wasn't too excited about this because we rarely receive calls on this line, but today  
5 was different. At 12:23 p.m., someone called from a number registered to a pay phone near Park  
6 Lane High School. I remember the exact time because I recorded the time of the call in our call  
7 log. The caller seemed to be in a hurry and only managed to say that there was a "weird  
8 container" in a trash can at the school. The person sounded young, but because the message was  
9 so short, I was not able to obtain any more information by the voice alone. Although my first  
10 reaction was that this was just another prank call, we do take all threats to schools seriously, so I  
11 went down to check.

12  
13 I arrived around 12:35 p.m. and went to the administration office to let them know what  
14 was happening. I asked for a map of the campus, which they provided, and for any other  
15 information they could give me on the trash cans. They informed me that the trash cans were  
16 emptied once a day after lunch, so they might be pretty full, and that they were located in  
17 hallways, near exits, in the bathrooms, in classrooms, and near the cafeteria. They then called the  
18 janitors and told them not to touch the trash cans.

19  
20 I proceeded to search the campus. The principal accompanied me. Most of the kids were  
21 already in their fifth period classes. There were a few stragglers outside, but otherwise everyone  
22 else was inside the classrooms. I started in the main quad and moved my way toward the primary  
23 entrance and the cafeteria. I was beginning to think that the call really had been a prank when I  
24 came to the dining patio.

25  
26 There were a total of two trash cans located there. In the second one, I cleared some lunch  
27 remains away and saw that there was a clear container with a lid, cylindrical in shape and made  
28 of what looked like clear plastic, placed in the can. It had a liquid in it. What was suspicious  
29 about this container, though, was that it had a watch duct-taped to it. The watch only had an hour  
30 hand, no minute or second hand. The hour hand was pointing approximately between the twelve  
31 and one. Attached to the watch were wires connected to a metal strip. Remembering back to the  
32 bomb training I had as a cadet, I recognized this as a timer, which could possibly ignite whatever  
33 was in that container.

34  
35 I told the principal that it would be necessary to evacuate the school through an exit other  
36 than the one by the cafeteria, and the principal hurried back to the administration office. I then  
37 called the station and informed the Captain. I then called the bomb squad. A bell started to ring,  
38 and the students filed out of the classrooms.

39  
40 While I waited for the bomb squad, I stayed near the dining patio to make sure no one  
41 came near the area. The bomb squad arrived. When the situation was under control, the bomb  
42 squad took the disabled container to the lab for analysis.

43 The next day, Saturday, April 5, I continued work on the case and was at the station by  
44 8 o'clock in the morning. The lab results had returned. I took a quick look and saw that they had  
45 identified two ingredients in the container: Doxene and paint thinner. No fingerprints were found  
46 on the container; it had probably been wiped down or being in the trash can may have caused any  
47 prints on it to be obscured.

48

49 At 9 a.m., Sawyer Simpson, a student at Park Lane, came in to tell me about some  
50 suspicious behavior witnessed the day of the bomb scare. Sawyer told me how Casey Campbell  
51 had been lurking around the dining patio early yesterday morning before school started. Sawyer  
52 also told me about an incident that occurred that past Wednesday when Casey had told him/her,  
53 "You will be sorry that you ever picked on me."

54

55 Sawyer also informed me that she/he had found some disturbing online images on the  
56 R-Place profile of Casey Campbell. I got on a computer and searched for Casey's R-Place page.  
57 We had recently received training concerning Internet predators, so I was familiar with the site.  
58 When I saw the pictures on Casey's page of Park Lane High in flames, I immediately sought a  
59 search warrant, which the judge issued.

60

61 I hurried down to the Campbell residence and knocked on the door. Casey answered and  
62 seemed surprised to see me. Casey sat on the couch while I searched the house. I started in the  
63 garage and found an almost empty container of paint thinner. I then went into Casey's room.  
64 There were drawings covering most of one wall and an easel and art supplies in the corner.

65

66 The paintings were of various topics, including a beach scene and a few family portraits.  
67 However, each had a strange twist to it. For example, there was a picture of Casey and friends,  
68 but all of their skin had been tinted green. Another one was a pretty typical beach scene, but with  
69 objects that seemed out of place, such as a refrigerator and a microwave. Some of the drawings  
70 depicted Park Lane in various stages of disarray. There also was a stack of notebooks with some  
71 more drawings in them by the bed. I skimmed through them and was struck by some pretty  
72 violent material. Many of the characters were labeled "Sawyer."

73

74 I arrested Casey. I felt I had sufficient evidence with Sawyer's statement, the pictures,  
75 notebooks, and paint thinner. I learned later that the lab had found Casey's fingerprints on the  
76 paint thinner container. All the relevant information from my investigation is detailed in this  
77 statement.

**PROSECUTION WITNESS STATEMENT**  
**DR. KIM KILLIAN**

1 My name is Dr. Kim Killian. I am 54 years old and hold a B.S. in electrical engineering  
2 from Utah University and an M.S. and Ph.D. in biochemistry, both from MIT. I have been a  
3 bomb technician for the Park Lane County Hazardous Devices Unit for 20 years and have been  
4 the supervisor for almost six years. I am the author of the field guide used by many of the nation's  
5 bomb squads, which covers topics ranging from timing devices to the chemical compositions of  
6 explosives. I also regularly lecture at police academies and at major universities throughout the  
7 United States.

8

9 My team was called to Park Lane High School on April 4, 2008. We arrived around  
10 1 p.m. and were directed by Detective Riley to the trash can. While the rest of the team searched  
11 the area for more devices, I activated our RCV, or remotely controlled vehicle, and sent it in to  
12 get video images of the device. The RCV gives us an extremely clear picture of what we are  
13 dealing with.

14

15 From the look of the container, I determined that the device was a time bomb of a  
16 standard type. There was a liquid inside a clear plastic container, and a timing device and igniter  
17 strip were attached. The igniter strip was nothing special; it is a tool found in most high school  
18 chemistry labs and is used for speeding up reactions. The watch was a regular watch with an  
19 analog display, but the minute and second hands were missing. Given that the minute and  
20 second hands were missing, the device could have been set up to 12 hours before the time of  
21 detonation.

22

23 Although the job looked pretty amateur, it still appeared to be fully functioning. I,  
24 therefore, needed to establish how much time I had before the device was set to ignite. I  
25 compared the time on the wristwatch to the time on my watch. The hour hand was the only  
26 indication of the time, but it seemed to be in the same position as the one on my own watch with  
27 the hour hand pointing approximately between the one and two. Seeing as the time was accurate,  
28 this made it easier to figure out when it was scheduled to detonate.

29

30 By examining the trail of wires and their position relative to the watch, I decided that the  
31 device was set to go off at 3 p.m. When the wires and hour hand are in alignment, a circuit is  
32 completed, creating a charge that heats the metal igniter strip rapidly, causing any explosive  
33 material nearby to combust. With 3 o'clock being more than an hour away, I knew that I could  
34 take my time and dismantle the device.

35

36 Since the device was of rather simple construction, I decided to go in and disconnect the  
37 wires that attached the wristwatch to the metal igniter strip and to the size-D battery. With full  
38 gear on, I dismantled the device. I still did not know what the liquid inside the container was and  
39 the amount of harm it could cause. However, we could tell that the liquid was not presently  
40 giving off heat or bubbling, and the plastic containers were still intact, so it was deemed safe to  
41 transport. I placed the container in a reinforced box, put it in the safety hood in our truck, and  
42 drove back to our lab.

43 In our lab's special airtight detonation chamber, I took a small sample from the container  
44 using a syringe tool. It left only a small pin hole in the container. Once I had the sample, I  
45 punctured a large hole in the container. Nothing happened initially, but then I pumped oxygen  
46 into the chamber. A gas started to fill the chamber. From this reaction, I determined that the  
47 liquid reacted with oxygen. The same reaction would have occurred if the liquid had been  
48 exposed to the air while it was in the trash can, since oxygen is in the air.

49

50 Next, I took the sample and started performing tests. The tests also are performed in  
51 airtight rooms, so we have to wear special suits with oxygen masks. Through a process called  
52 chromatography, I separated the components of the mixture. The experiments revealed that the  
53 liquid was a mixture of paint thinner and Doxene. I sent these results over to the police station.

54

55 Doxene is a very common industrial cleaner. Janitors at places like office buildings and  
56 schools would have it on hand. Like any strong cleaner, it should be handled with care, as  
57 Doxene can be irritating to the eyes, digestive tract, and skin.

58

59 Doxene and paint thinner are a volatile combination. As seen from the reaction in the  
60 detonation chamber, when exposed to oxygen, there is an instantaneous release of gas. The metal  
61 igniter strip would have burned a hole through the container, exposing the mixture to oxygen.  
62 Additionally, if exposed to a burst of heat, such as that produced by an igniter strip, the gas  
63 would have exploded as it escaped from the container, releasing a great amount of heat in the  
64 process.

65

66 If ignited, the explosion would have been powerful enough to blow up the entire side of  
67 Park Lane's cafeteria. The battery, even one as small as the D-size battery used in this case,  
68 would have provided the extra energy needed to make the solution explode. Anyone within a  
69 60-foot radius would have been seriously injured or killed. Even if it did not explode, this type of  
70 device is still very dangerous. The release of a strong-smelling gas into the air, at a school full of  
71 people, would create a panic. Someone would have been hurt. In my experience, there is not a  
72 practical use for a solution of paint thinner and Doxene. Rather, it is commonly used by amateur  
73 bomb-makers because of its effectiveness and availability.

74

75 Finally, whenever my team is called out to the scene, we handle all lab work involved  
76 with the case, including fingerprint analyses. No fingerprints were found on the device itself.  
77 However, I did find fingerprints on the container of paint thinner from the Campbell garage.  
78 When compared with Casey's fingerprints, I found a match.

**PROSECUTION WITNESS STATEMENT**  
**SAWYER SIMPSON**

1           My name is Sawyer Simpson, and I am 18 years old. I am a senior at Park Lane High  
2 School and live with my parents. I have two older sisters, but they have both moved away to  
3 attend college.

4  
5           I have had the same friends for a long time, and we are a tight-knit group. I would say that  
6 a lot of the kids at Park Lane look up to us for one reason or another. On campus, we have been  
7 nicknamed The Crew.

8  
9           Casey and I have gone to the same school for a while now, but we have never had much  
10 to do with each other. I think we may have had chemistry, the class I am best in, together. I even  
11 won the Park Lane Chemist of the Year Award this year. Sometimes I see Casey walking home  
12 from school, and I might shout Casey's way or say some joke when Casey is around, but I think  
13 Casey might misinterpret our actions. The Crew just likes to mess around and have a little fun  
14 sometimes. We are all decent kids, and none of us has ever been in any serious trouble.

15  
16           The last week in March, I was called into the counselor's office. Counselor Cortez told  
17 me that some students had complained about me picking on them. I thought of Casey  
18 immediately. Counselor Cortez said that all of my senior activities could be taken away if another  
19 complaint was received. I was shocked. The complaints were completely false. The person  
20 making the complaints must have been crazy. I told the counselor that there was nothing to worry  
21 about. I didn't want to get into trouble, and I would be more careful about who I talked to.

22  
23           I remember a couple of strange encounters I had with Casey. On Wednesday, April 2, my  
24 friends and I were hanging out, just talking and relaxing after school on the dining patio by the  
25 cafeteria. Ever since freshmen year, that had been our spot. We usually meet there right after  
26 school to unwind until about 3:15 p.m., then we would all go to our other school activities or  
27 head home to start our homework. Casey walked by on that Wednesday, and I yelled, "Don't you  
28 want to come hang out with us?" Casey hesitated and then spun around and said, "You will be  
29 sorry you ever picked on me." I was a little stunned at first. I don't think Casey had ever spoken  
30 to me directly before, but then Casey turned back around and walked out of the school.

31  
32           The incident stuck with me. Casey had always been a little creepy, drawing strange  
33 things, and I wasn't sure what to expect. Casey didn't have a big group of friends and seemed to  
34 be off in a different world. I decided after that Wednesday to keep my distance from Casey.  
35 I passed Casey in the halls a couple of times on Thursday, but my next significant meeting with  
36 Casey was on Friday morning, the day of the evacuation. I was on my way to school early to  
37 make up a test that I had missed the previous week. It must have been around 6:45 a.m. since the  
38 test was half an hour and school started at 7:30 a.m., and I couldn't be late. I parked my car in my  
39 regular spot and started walking to campus.

40  
41           I looked over at the dining patio to see if any of my friends had come to school early.  
42 Instead, I saw Casey over there. I thought this was strange, considering that Casey always speeds

43 by the place when The Crew is around. I watched Casey go over to a trash can and peek inside. I  
44 didn't see Casey throw anything in it, but after looking inside the trash can, Casey looked up,  
45 scanned the area, and started to walk away. Casey didn't see me since I was by the math building.  
46

47         The rest of the morning went like any other morning at school. I took the test, went to my  
48 classes, and then met up with my friends for lunch. As I was walking to my fifth period class  
49 after picking up an English book from my car, I saw that a police detective had pulled into the  
50 parking lot. I didn't think much of it at the time because officers often come to our school for  
51 routine checks.  
52

53         About 20 minutes into our fifth period class, what sounded like the fire alarm bell started  
54 ringing. The principal came onto the loud speaker and told us to head to the back exit of the  
55 school, by the athletic fields.  
56

57         A little later, a couple of kids who had class near the cafeteria started telling everyone that  
58 a police officer was near the dining patio. They also said they saw a big truck that looked like it  
59 belonged to the bomb squad pull up. I started to think about how The Crew hangs out on the  
60 dining patio and what could have happened if a bomb went off while we were there, but before I  
61 could get too worked up, we were told to go home and not return to campus. I was glad I had my  
62 car keys in my pocket, so I could walk around the campus and then drive home.  
63

64         The next morning, though, I woke up early and started to put everything together in my  
65 head. I remembered one day when I was Googling people, I came across Casey's R-Place page. I  
66 saw Casey's list of interests, which included pyrotechnics. Casey had art work in there, and I  
67 recognized that Park Lane High School was part of the background graphics. I also saw that one  
68 of the school buildings was on fire. Huge flames rose from the building, and a person was trying  
69 to get out of the building. The person was labeled "Sawyer." A couple of my friends' names also  
70 were on the picture. When I put this all together, it just didn't seem like a coincidence that all the  
71 things that happened with Casey occurred the same week as a bomb scare. I told my parents, and  
72 my dad decided to drive me over to the police station. It was there that I met Detective Riley, and  
73 I told the detective everything that had happened.



## DEFENSE WITNESS STATEMENT CASEY CAMPBELL

1           My name is Casey Campbell. I am 17 years old and a senior at Park Lane High School. I  
2 live at 10016 Calle Vista with my mom, dad, and younger brother. I have lived in this house for  
3 my whole life.

4

5           I would say my high school experience has been pretty typical; that is, until this year. I  
6 have been on the honor roll every semester, except for this most recent one. I'm involved in a  
7 couple of school activities, and even though I almost failed chemistry last semester, I'm still the  
8 treasurer of the Science Club, which meets after school. I am hoping to go to either New York  
9 University or UCLA in the fall. I am definitely not the most popular kid in school, but I have my  
10 own small group of friends. We like to surf the Internet, watch DVDs, and I personally enjoy art.

11

12           This past September I started getting picked on by The Crew. The Crew is a group of  
13 seniors at Park Lane. Everyone at school knows who the people in The Crew are because they  
14 walk around like they own the school. They picked the cafeteria's dining patio as their hang-out  
15 their freshmen year, and no one has dared to challenge them. I don't know why, but all the  
16 members of The Crew are idolized at Park Lane, especially their leader, Sawyer Simpson.  
17 Students try to copy the way they dress, and members of The Crew are always invited to parties.

18

19           It seems like every year The Crew has one person it picks on the most. I remember last  
20 year's target, Brady, switched schools in December. On the first day of school, while I was  
21 walking home, Sawyer picked me out from the crowd. Unfortunately, my stack of advanced  
22 science, math, and English books or my colorful sneakers must have made me stand out from  
23 everyone else. That was the day when all the harassment started.

24

25           I came to school the next day and got shoved as I turned a corner. It escalated from there.  
26 One day I found an unflattering picture on my locker. It had my face on the body of a donkey.  
27 Although I tore it down, plenty of other kids had already seen it. For days, people would laugh or  
28 point as I passed them in the hallway. There also is a lot of name-calling and jokes at my  
29 expense, all which seem to happen in front of a crowd of people, so that I am the hot topic of  
30 school gossip.

31

32           The Crew's behavior does bother me. After a particularly bad day, usually after I run into  
33 Sawyer and The Crew at the dining patio, I can't concentrate on my school work. My grades have  
34 dropped this semester because of it. I am worried about what will happen in the future if my  
35 grades continue to drop. My neighbor, Jamie, the one person in The Crew who doesn't make fun  
36 of me, doesn't know why they pick on me.

37

38           Of course, I wish it would stop. I often imagine there is something I can do about it, and  
39 then I draw or paint pictures that express those feelings. I have always loved art and try to  
40 paint and draw in my spare time. In fact, I am thinking of pursuing a career in the arts. I try to  
41 learn all about the field. For the past year or so, I have been picking artists and trying to copy  
42 their style.

43 In the process, I am able to add to my own style. Right now I am experimenting with the  
44 style of Salvador Dali. Art also is a way for me to vent my frustration. I don't just draw pictures  
45 about Park Lane, either. I have notebooks full of nature scenes, and I occasionally take  
46 photographs and manipulate them on the computer. All my art comes from thoughts in my head,  
47 but it never occurs to me that the thoughts will become reality.

48

49 In March, I went in to see Counselor Cortez. I had waited for the whole thing with The  
50 Crew to blow over, but it hadn't. I told the counselor about some of my run-ins with The Crew  
51 and how Sawyer was the worst of the group. Counselor Cortez said that the school would call  
52 Sawyer in and make sure that Sawyer understood that there were consequences for hurting  
53 people. The counselor also told me to continue making art and doing other creative things, as  
54 they were good ways to deal with my frustration.

55

56 Additionally, I did try to stand up for myself once. One day after school, as Sawyer was  
57 calling me the usual names, I surprised myself by saying, "You will be sorry you ever picked on  
58 me," meaning I would go back to see the counselor. I didn't plan on saying anything; it just came  
59 out. Obviously, it didn't work, as they just laughed at me. I was so humiliated that when I turned  
60 to run, I tripped on the sidewalk. I try to avoid Sawyer, but because the school is surrounded by a  
61 canyon to the east, a private business park to the west, and I live behind the school, I have to pass  
62 The Crew on my way home as I exit the school from Gate One.

63

64 Many times on the way to school, Jamie and I have discussed how The Crew treats me.  
65 Jamie knows about my drawings and the stories, and even though Jamie is in The Crew, Jamie  
66 doesn't blame me for making them. Jamie sees firsthand how badly they treat me. I consider  
67 Jamie my friend. I even created my R-Place page, so that we could leave messages on each  
68 other's pages.

69

70 Posting the actual drawings on R-Place is just another part of the fantasy. It also is a way  
71 for me to gain exposure as an artist. Online you can be whoever you want to be, and I want to be  
72 someone who is not made fun of. Besides, I never thought anyone from The Crew, except Jamie,  
73 would see it. I figured since they obviously don't like me, they wouldn't waste their time looking  
74 me up and then reading about me. If they did read my page, it would only be to find more  
75 material to torture me with.

76

77 The events of April 4, 2008, scared me as much as everyone else. I showed up to school  
78 at around 7 a.m., half an hour before school, and went to the library to finish up some homework.  
79 I don't always show up that early, but I had a project due that morning, and I wanted to make sure  
80 it was complete. I went to four classes and then ate lunch in my teacher's classroom over by the  
81 parking lot. My former chemistry teacher lets me eat in her classroom, even though she isn't in  
82 the room. I stayed there the entire time, so I was not the one who called the police about the  
83 container.

84

85 As I was sitting in my fifth period class after lunch, a bell went off, and the principal's  
86 voice came over the speaker and told everyone to head toward the school's back exit near the  
87 athletic fields. I thought this was strange since that exit usually had an alarm during the day. The

88 school tried to keep the events quiet, but we realized the bomb squad was by the cafeteria, and  
89 we all got a little scared. I was relieved to learn we were all being sent home. We weren't even  
90 allowed to go back for our things that we left behind. I was just glad that nothing happened to me  
91 since I usually walk by the cafeteria on my way home.

92

93 I was extremely surprised to see Detective Riley at my house the following Saturday,  
94 April 5. The paint thinner in the garage is mine, of course. I use it to clean up paint and other  
95 messes I make when I am doing my art. After I finish a piece, I will take it outside to photograph  
96 and then clean my paintbrushes with the paint thinner. The whole neighborhood can probably  
97 smell it from the backyard. Since I had to move the container from the garage to the outside and  
98 back again, my prints would be on it.



**DEFENSE WITNESS STATEMENT**  
**DR. AVERY ATKINSON**

1 My name is Dr. Avery Atkinson. I am 48 years old and have a B.S. in mechanical  
2 engineering from Western State University and an M.S. and Ph.D. in chemistry from Stanford  
3 University. I am the head scientist for a leading weapons manufacturer in the United States. My  
4 job is to invent new explosives and chemical agents, as well as mechanisms for their delivery. I  
5 also have been a consultant for the Secretary of Defense and have helped the military formulate  
6 safety procedures for handling explosives. I regularly publish articles in recognized scientific  
7 journals.

8

9 Bombs can be very complicated and sensitive devices, requiring a lot of experience and  
10 knowledge to make them work properly. Time bombs, in particular, are difficult to construct.  
11 Many factors have to come together at the same time. For example, the timer has to be accurate,  
12 and there must be no gaps in the circuit.

13

14 I have examined both the time piece from the device and the lab results of the Park Lane  
15 bomb squad. With the device disassembled, we may never be able to tell whether the connections  
16 were properly made to complete a circuit. This makes it hard to determine who the intended  
17 target was or if there were even a target. Since the minute and second hands were removed, the  
18 time could have varied by as much as an hour from Dr. Killian's estimate. Additionally, the  
19 watch was not particularly sophisticated and likely inaccurate. Moreover, unless the wires were  
20 connected properly to the igniter and battery, there would have been no charge to cause the  
21 device to ignite.

22

23 I agree with Dr. Killian that the solution consisted of Doxene and paint thinner. Doxene is  
24 a commonly used cleaner, and we all know that paint thinner can be bought at the local hardware  
25 store. However, I think Dr. Killian exaggerates the effects of the combination of Doxene and  
26 paint thinner.

27

28 To produce a gas, the solution must be exposed to a high concentration of oxygen, such  
29 as that which was pumped into the detonation chamber at the bomb squad's lab. In the lab, there  
30 was likely a pure dose of oxygen pumped into the chamber. On the other hand, the atmosphere  
31 only has about a 21 percent oxygen concentration. Unless the solution is exposed to oxygen,  
32 thereby forming a gas, there is no way to ignite the solution in liquid form.

33

34 Additionally, the device would require a significant power supply to get a charge capable  
35 of igniting it. A standard D-size battery is enough to power a radio, but not a bomb. It would  
36 have burned only a small hole in the container, about the size of a dime. When combined with  
37 the container's placement in an almost full trash can, oxygen would have combined with the  
38 solution slowly. This would result in a minimal amount of gas production, not a rapid release.  
39 The explosive effect is a product of the amount of gas released and the heat produced by the  
40 igniter. With only a small amount of gas and an unsophisticated igniter, the device would do little  
41 more than make a trash can smell a little worse. Whoever put this together created nothing more  
42 than an elaborate stink bomb.

43           Therefore, while it is true that Doxene can irritate the eyes, and paint thinner has a  
44 pungent odor, this is the extent of the damage that the solution would cause. In large amounts, it  
45 might cause some skin discomfort, but only if a part of the body were drenched in it.

46

47           At my company, we experimented with Doxene and paint thinner as a possible explosive.  
48 After extensive testing, we determined that a steady flow of oxygen was necessary to get the  
49 rapid release of gas necessary to form an explosive with a power great enough to do any damage.

**DEFENSE WITNESS STATEMENT**  
**CAMERON CORTEZ**

1 My name is Cameron Cortez, and I am 31 years old. I have a B.A. in psychology and a  
2 M.A. in counseling, both from Beehive State College. I am a guidance counselor at Park Lane  
3 High School and have been for about five years.

4  
5 I have spoken with Casey many times during Casey's high school career. I helped Casey  
6 decide what classes to take and also developed a plan of action to help Casey get into college. I  
7 was very upset when Casey came into my office in March and told me that Sawyer Simpson and  
8 friends were picking on her/him. He/she told me about the name-calling after school and other  
9 interactions in the hallway. I believed Casey. There were signs that Casey was being bullied. For  
10 example, Casey's most recent report card showed a significant drop.

11  
12 I suggested to Casey that since Casey likes art so much, painting and drawing could be a  
13 good way to get one's mind off The Crew. It is important that students have an outlet. Drawing  
14 and painting are good ways to let go of anger and frustration. Fantasy can be a good way to  
15 escape experiences at school.

16  
17 Additionally, I had my suspicions about Sawyer and the group called The Crew. Last  
18 year, a freshman named Brady ended up transferring schools. I think Brady had been unhappy for  
19 sometime. He was withdrawn and had missed many days of school, which are common effects of  
20 bullying. Then Brady was accused of vandalizing the school. Near the end of first semester last  
21 year, a number of explicit words were scrawled on the trophy case with spray paint. The day after  
22 the incident, I personally received an anonymous note naming Brady as the vandal. We had to  
23 call Brady into the office, but we never informed anyone about the note.

24  
25 I asked Brady about the vandalism. He denied any involvement. I asked him who would  
26 try to accuse him. Brady said that the only person who gave him any trouble was Sawyer. We  
27 were able to clear Brady after a full investigation. We never found any evidence to implicate  
28 Sawyer, however. Nevertheless, I think that was the last straw for Brady. Brady left soon  
29 thereafter.

30  
31 I talked with Sawyer after Brady left school, and Sawyer made what I thought was a  
32 strange comment. Sawyer said, "I guess Brady couldn't take it anymore. I wonder how everybody  
33 got the idea that Brady was such a brilliant graffiti artist?"

34  
35 Following this talk with Brady and the comment by Sawyer, I kept a close eye on Sawyer.  
36 However, I was never able to catch Sawyer in the act, and no other students came forward. If the  
37 bullying were happening, it was most likely psychological. Although this type of bullying is just  
38 as harmful as physical bullying, it is much harder to catch. However, after I talked with Casey, I  
39 decided to call Sawyer into my office.

40  
41 I told Sawyer about the accusations, without revealing Casey's identity. Then I informed  
42 Sawyer that the school takes the issue of bullying very seriously. The school takes the issue so

43 seriously, in fact, that if I heard of any other incidents involving Sawyer, I would be authorized  
44 to take away Sawyer's senior privileges. These privileges included attending prom and  
45 participating in graduation ceremonies. Moreover, Sawyer could possibly be suspended or even  
46 expelled.

47

48 At first Sawyer seemed a little shocked, but that didn't last long. After a few seconds of  
49 silence, Sawyer smiled and denied the accusations. Sawyer admitted aiming some comments at  
50 Casey during senior year, but added that she/he never intended to hurt Casey in any way. Sawyer  
51 said that whoever was complaining was lying and must have been crazy. I let Sawyer get back to  
52 class, but I still had many suspicions.

53

54 The morning of April 4 started off at 7 a.m. when I arrived at the school. That early there  
55 are very few students on campus, and I can get a lot of work done. The gates to the school are  
56 locked from 5 p.m. to 6 a.m., so I really can't get to school too much earlier. At 9 a.m., there was  
57 an administrative meeting. Advanced placement tests were coming up, and we were in charge of  
58 organizing the rooms and finding proctors for the exams. I was back in my office by the start of  
59 lunch. I checked my messages and started eating my lunch.

60

61 My office has one window that looks straight at the math building. Around 12:25 p.m., I  
62 looked out the window and saw Casey walking toward the center of campus, back from the area  
63 around the parking lot. Students aren't supposed to hang out in the parking lot during lunch, but  
64 there is a pay phone and a number of classrooms near the parking lot's edge that students have  
65 access to. A few minutes later, I saw Sawyer walk down the same path, heading away from the  
66 parking lot towards the center of campus. At 12:30 p.m., the lunch bell rang, and I thought to  
67 myself that Sawyer was probably going to be late for class. I didn't pay any more attention,  
68 though, because I had a lot of work to do.

69

70 About 20 minutes later, a bell started ringing, and the vice principal came around to tell  
71 us about the bomb found by the cafeteria. The staff had practiced their roles in case of such an  
72 event. As the principal made an announcement over the speaker, we started checking the  
73 classrooms to make sure everyone was outside. Once we saw that the campus was clear, we  
74 joined the kids by the athletic fields. The principal then informed us that the kids should be sent  
75 home, that no one would be allowed back on campus, and the kids would only be allowed to get  
76 their cars. The staff made the announcement and directed the kids to the exit. We then stood  
77 guard at the exits to make sure no one came back to the area.



## **PHYSICAL EVIDENCE**

Only the following physical evidence may be introduced at trial.

1. Exhibit A, diagram of Park Lane High School.
2. Exhibit B, Casey Campbell's R-Space page.
3. Exhibit C, a diagram of the device found at Park Lane High School.

## **STIPULATIONS**

Stipulations shall be considered part of the record. Prosecution and defense stipulate to the following:

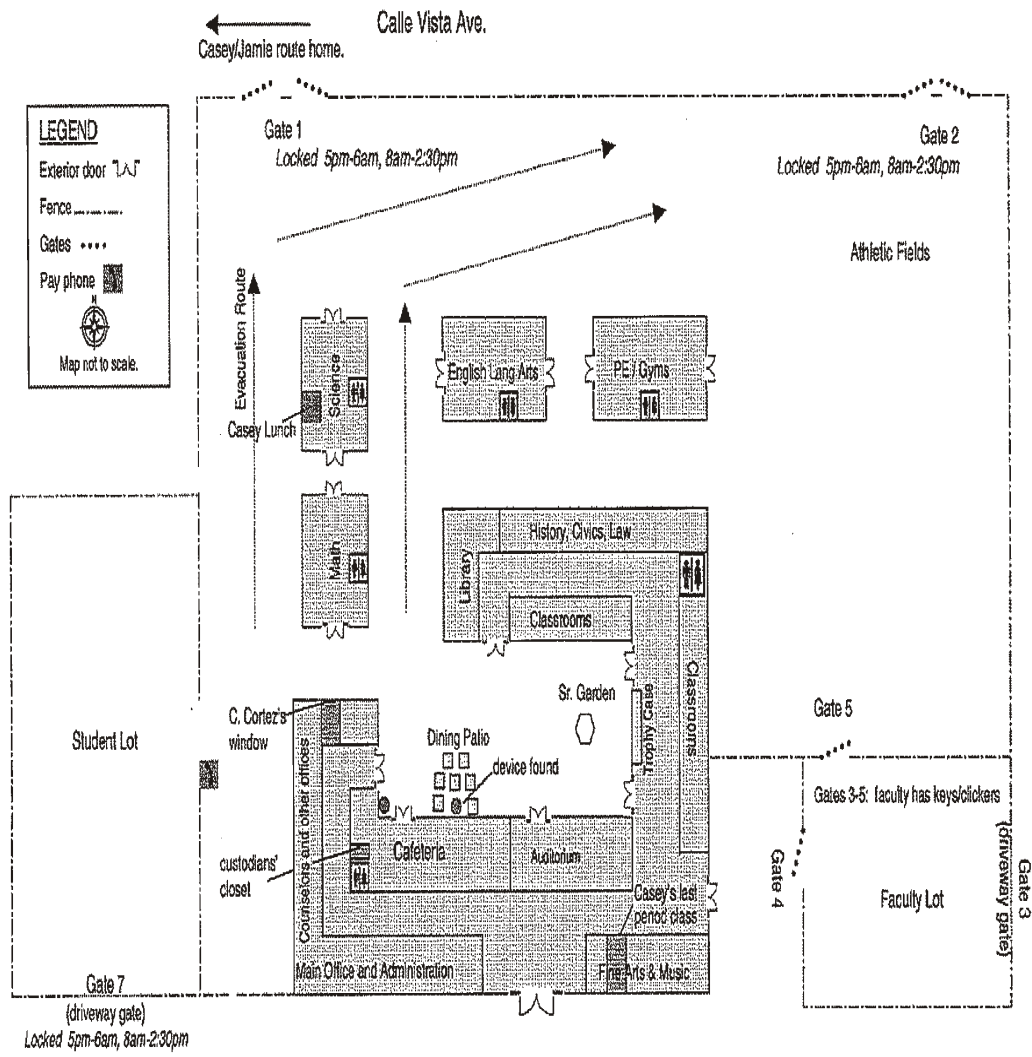
1. Exhibit A is the diagram of Park Lane High School; Exhibit B is a copy of Casey Campbell's R-Place page; and Exhibit C is a diagram of the device found at Park Lane High School and represents the device immediately before being dismantled by Dr. Kim Killian.
2. Casey Campbell created and maintained the R-Place page as identified in Exhibit B and referenced in the fact statement and witness statements.
3. Casey created the drawing as depicted in Exhibit B and the drawings/photos found in Casey's room and on Casey's R-Place page.
4. The search of Casey Campbell's house was a valid search to which there may not be an objection.
5. Dr. Kim Killian and Dr. Avery Atkinson are qualified to be expert witnesses.
6. Dr. Atkinson can testify to the lab report, and its absence may not be questioned.
7. The chain of custody of the device found by Detective Riley at Park Lane High School is not in dispute.
8. All physical evidence and witnesses not provided for in the case packet are unavailable, and their availability may not be questioned.
9. All witness statements were taken in a timely manner.



# **EXHIBITS**

# EXHIBIT A

## Diagram of Park Lane High School



# EXHIBIT B

## Casey Campbell's R-Place Page

[www.r-place.com/101072809](http://www.r-place.com/101072809)

[Home](#) [Search](#) [Invite](#) [Mail](#) [Blog](#) [Chat](#)

### Casey's Page

#### About Casey

**Lives:** Park Lane, USA

**Occupation:** Student

**Zodiac:** Capricorn

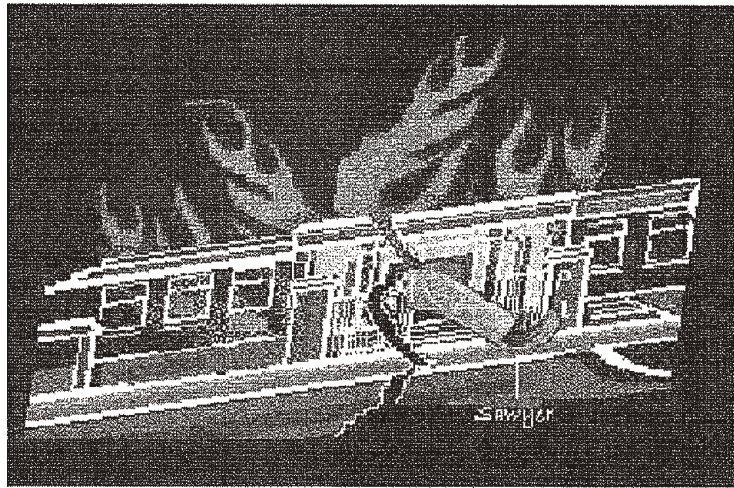
**Age:** 17

#### Casey's Interests

Art, pyrotechnics, video

games, DVDs

#### Casey's Latest Post



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See how the Dan's  
Championship Series in Action  
PURCHASE MOCK TRIAL VIDEOS AND DVDS

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**EXHIBIT C**  
**Diagram of Device**

