

1 Curtis Jones

2 was called as a witness and having been first duly
3 sworn, testified as follows:

4 DIRECT EXAMINATION

5 **QUESTIONS BY MR. MOSS:**

6 Q. Will you, please, state your name for the
7 record.

8 A. Curtis Jones. I am a deputy with the Harris
9 County Sheriff's Office.

10 Q. And you are employed by Harris County?

11 A. Yes.

12 Q. And what role do you play with the Harris
13 County Sheriff's Office?

14 A. I am a patrol officer. I investigate
15 accidents, take calls for service, disturbances and
16 different things like that.

17 Q. How long have you been with Harris County?

18 A. Nine years.

19 Q. How many of those years on patrol?

20 A. Four.

21 Q. So on the night of October 16th, 2010, were
22 you a patrol deputy at that time?

23 A. Yes.

24 Q. Were you working that night?

25 A. Yes.

1 Q. Did you have a chance to come into contact
2 with Chester Dean Brown on that night?

3 A. Yes, on the accident.

4 Q. Do you see him in the courtroom today?

5 A. Yes, sir.

6 Q. Will you, please, identify him by an article
7 of clothing and point to him?

8 A. The guy in the white and tan shirt.

9 MR. MOSS: May the record, please,
10 reflect that the witness has identified the defendant?

11 THE COURT: It will.

12 Q. (By Mr. Moss) So how did you come into
13 contact with Mr. Brown?

14 A. I responded to a major accident at Demontrond
15 and Kuykendahl.

16 Q. Is it normal for you to respond to accidents?

17 A. Yes.

18 Q. So when you get to an accident scene, what
19 are your duties?

20 A. I observe the scene. I identify the parties
21 involved in the accident. I identify the witnesses,
22 just determine what is going on at the time.

23 Q. So you responded to an accident at Kuykendahl
24 and what street?

25 A. Demontrond.

1 Q. Is that in Harris County, Texas?

2 A. Yes.

3 Q. So you get to the accident scene about what
4 time was this?

5 A. About 8:00 o'clock.

6 Q. Was it dark yet?

7 A. Yes.

8 Q. Now, what did you observe when you get to the
9 scene?

10 A. Multiple EMS; Houston Fire EMS and Houston
11 fire and paramedics were on the scene. I parked my
12 car on Demontrond facing west. I got out of my car;
13 and I observed a two-vehicle accident, a motor bike
14 and a two-door vehicle, a Geo.

15 Q. Let me stop you right there.

16 So the two vehicles that were involved in
17 the accident are a Geo and a motorcycle?

18 A. Yes.

19 Q. What color was the Geo?

20 A. White.

21 Q. And is that Geo, is that a motor vehicle?

22 A. Yes.

23 Q. Was there any damage to either vehicle?

24 A. Yes.

25 Q. What type of damage was there to the Geo?

1 A. Right side damage, heavy right side damage.

2 Q. Right side, is that the driver's or
3 passenger's side?

4 A. Passenger's side.

5 Q. What type of damage was done to the
6 motorcycle.

7 A. Front damage.

8 Q. So were you able to see -- or were there any
9 witnesses on the scene?

10 A. It was two witnesses on the scene. After I
11 got in my car and started identifying people, I kind
12 of put them to the side by my car so I could see them
13 and make sure that they didn't go anywhere while I
14 took care of everything else.

15 Q. Now, were they injured?

16 A. No.

17 Q. Was there anyone injured who had come from
18 the motorcycle?

19 A. Yes.

20 Q. Who did you see that was injured there?

21 A. I observed a white female on the ground. To
22 tell you the truth, I thought that she was dead. I
23 saw some blood on the ground by her head. She wasn't
24 moving. She was being worked on by EMS.

25 Q. You said that you saw Mr. Brown?

1 A. Yes.

2 Q. How did you come into contact with him?

3 A. I came in contact with him. He was speaking
4 to some paramedics or maybe the fire department. I
5 got his ID, or I identified him by his ID or maybe his
6 date of birth. I can't remember. It is my normal
7 practice for me to identify you by some form. I
8 identified him, and I went to see the status of the
9 other parties involved in the accident.

10 Q. So when you come to an accident scene like
11 this; and in this case after you identified the
12 parties, what was your next step?

13 A. Well, I called for a traffic unit due to the
14 severity of the accident. It didn't look like the
15 female on the ground was going to make it to me, so I
16 called for a traffic unit and let them come take care
17 of the scene.

18 MR. MOSS: May I approach the witness,
19 Your Honor?

20 THE COURT: You may.

21 Q. (By Mr. Moss) I am going to show you what
22 has been previously marked as State's Exhibit No. 1.

23 Do you recognize this?

24 A. Yes.

25 Q. And what is it?

1 A. It is a map of the area of Kuykendahl and
2 Demontrond.

3 Q. Is that a map of the area of the accident?

4 A. Yes.

5 Q. Does this map accurately reflect what a map
6 of that area should look like?

7 A. Yes.

8 Q. Is it an accurate depiction?

9 A. Yes.

10 MR. MOSS: At this time, Your Honor, the
11 state tenders to defense counsel State's Exhibit No. 1
12 and ask that it be admitted into evidence.

13 MR. GLASS: I have no objection, Your
14 Honor.

15 THE COURT: State's 1 is admitted.

16 MR. MOSS: May I publish?

17 THE COURT: You may.

18 MR. MOSS: I am going to zoom in a little
19 bit here.

20 Q. (By Mr. Moss) We are talking about this
21 intersection right here?

22 A. Yes, sir.

23 Q. And so like I said, it is in Harris County,
24 Texas, right?

25 A. Yes.

1 Q. Did an accident unit or traffic unit arrive?

2 A. Yes.

3 Q. And while you were waiting for the traffic
4 unit, what did you do?

5 A. Just getting the identification. I
6 identified everybody, getting times for EMS and making
7 sure where they were going and making sure my
8 witnesses are staying where I told them to be. It was
9 a lot going on and doing traffic control to try to
10 keep cars from actually coming up on us.

11 Q. So you were controlling the scene?

12 A. Yes.

13 Q. And after the traffic unit arrived, what were
14 your duties?

15 A. Well, I advised them of what we had going on;
16 and from that point on, I assisted in traffic control.

17 MR. MOSS: I will pass the witness, Your
18 Honor.

19 MR. GLASS: May I proceed, Your Honor?

20 THE COURT: You may.

21 **CROSS-EXAMINATION**

22 **QUESTIONS BY MR. GLASS:**

23 Q. Deputy Jones, did you inspect both of the
24 vehicles?

25 A. Did I inspect both of the vehicles?

1 Q. Yes.

2 Did you look at them?

3 A. I looked at them from the outside, yes, sir.
4 I just looked at them.

5 Q. Do you remember whether or not the Geo's
6 airbags were deployed?

7 A. I don't remember.

8 MR. GLASS: I have no further questions.

9 MR. MOSS: I have no questions, Your
10 Honor.

11 THE COURT: You may stand down.

12 Is there any objection to this witness
13 being excused?

14 MR. MOSS: None from the state.

15 MR. GLASS: None from the defense.

16 THE COURT: You are excused.

17 Call your next, please.

18 MR. MOSS: The state calls Deputy Garcia,
19 Your Honor.

20 THE BAILIFF: This witness has been
21 sworn.

22 THE COURT: Thank you.

23 Proceed, please, sir.

24 DONNA GARCIA

25 was called as a witness and having been first duly