

1 THE BAILIFF: All rise for the jury.

2 *(Recess taken.)*

3 THE COURT: Let's bring your next witness  
4 up, please.

5 MS. OSWALD: State would call Officer  
6 Jason Kelly to the stand.

7 THE COURT: Why don't you get him, please.

8 MS. OSWALD: This witness has not been  
9 sworn, Your Honor.

10 THE COURT: Raise your right hand, please.

11 *(Witness sworn.)*

12 THE COURT: All right. From the State,  
13 please.

14 **JASON KELLY,**

15 having been first duly sworn, testified as follows:

16 **DIRECT EXAMINATION**

17 BY MS. OSWALD:

18 Q. Officer, will you please introduce yourself to  
19 the jury.

20 A. Yes, ma'am. I'm Detective Jason Kelly. I work  
21 for the Baytown Police Department.

22 Q. And how long have you been with Baytown?

23 A. I've been with Baytown almost 11 years, four of  
24 which have been in the Crimes Against Children Division.

25 Q. Before we talk about the Crimes Against

1 Children Division, let's talk about your training.

2 Prior to being with Baytown PD, what did you do before  
3 that?

4 A. Went to college, studied criminal justice.

5 Q. And then after did you have to go through a  
6 police academy?

7 A. Went through a three-month police academy  
8 before I put on the uniform to become a patrol officer.

9 Q. And what kind of things do you learn at the  
10 academy?

11 A. Laws, basic police tactics, techniques.

12 Q. And then after those three months of kind of  
13 learning the basics, what do you do?

14 A. Depending on the department you are in Baytown,  
15 you spend three months with a senior officer riding  
16 around in a car, then teaching you how to be a police  
17 officer.

18 Q. So kind of like a training period?

19 A. Yes.

20 Q. After that three months, what did you do at  
21 that point in time?

22 A. At that point I was released to become an  
23 officer by myself, ride around, answering calls, doing  
24 normal police routine things.

25 Q. How long were you a patrol officer before you

1 became a detective?

2 A. Seven years.

3 Q. And what kind of extra training and experience  
4 did you have to go through to become a detective with  
5 Baytown?

6 A. Just numerous training classes, basic  
7 investigator courses starting off and depending on which  
8 division or group you go into. From that point, you  
9 know, you take specific training, depending on what  
10 field you're in.

11 Q. And how long have you been with the child abuse  
12 division?

13 A. It will be almost four years in July.

14 Q. What kind of training did you go through to be  
15 able to be a detective on these kind of cases?

16 A. Just numerous. Everything from forensic-type  
17 training, you know, depending on what the cases are to  
18 just learning how to deal with these type of cases  
19 specifically.

20 Q. And did you choose to go into child abuse or  
21 were you selected for that division?

22 A. I was chosen to do Crimes Against Children.

23 Q. And so you've been doing that for the past four  
24 years, is that right?

25 A. Yes, ma'am.

1 Q. And how many cases at any given time are you  
2 investigating?

3 A. When I started off in the division I had 250  
4 put on my desk.

5 Q. And did that range from --

6 A. It ranges --

7 Q. -- sexual abuse to actual physical abuse?

8 A. Physical abuse, neglectful supervision, sexual  
9 abuse, anything relating to children.

10 Q. Now, what does your normal investigation on  
11 sexual abuse cases of children entail?

12 A. Like, the -- how they come in and such?

13 Q. Yes.

14 A. Okay. Basically, our cases come in two ways.  
15 One way is through CPS, they come to our department and  
16 then we go off of that specific report. The other way  
17 is when a patrol officer takes the report. And once  
18 they're reported -- either way the report is received  
19 through to our department, they're routed to me. My  
20 sergeant gives them to me and I have to go forth with  
21 them at that point. At that point then I make contact  
22 with the victim's parents and then I go from there.

23 Q. Now, did you get assigned a case where the  
24 suspect was Jerry Mac Cameron?

25 A. Yes, I did.

1 Q. And when did you -- how did that case come to  
2 be under your investigation?

3 A. It was assigned to me by my sergeant.

4 Q. Do you know how the case actually came to the  
5 Baytown Police Department?

6 A. One of our patrol officers off the street took  
7 the original report.

8 Q. And after the original report is taken how long  
9 did it take to be assigned to you?

10 A. That really varies on when the sergeant reviews  
11 the reports. It could be a day, it could be, you know,  
12 a couple weeks. It just depends on him.

13 Q. And if you're aware, how long did it take for  
14 the report to be generated by the patrol officer before  
15 it actually got to your desk and you had a chance to  
16 start investigating?

17 A. Could I review my report?

18 Q. Yes. Yes, you may.

19 A. The report was taken on 10-1 and I was actually  
20 assigned this one on the same day. I'm sorry,  
21 October 1, 2012.

22 Q. Okay. Now when you were assigned it, do you  
23 actually -- were you able to actually start to  
24 investigate and delve into the case at that time?

25 A. No, ma'am.

1 Q. When did you actually -- are you able to start  
2 interviewing witnesses and investigating the case?

3 A. I began basically the investigation on  
4 November 1, 2012, with the forensic interview.

5 Q. And why was there that month delay between the  
6 report that the -- from the complainant's mother and the  
7 time you started investigating?

8 A. Caseload. First one in, first one up; unless  
9 it's, you know, my sergeant tells me to get on this one,  
10 a specific one. I try to go down the order to be fair.

11 Q. Is there kind of a triage system with regards  
12 to certain cases that come into your division?

13 A. Very much so.

14 Q. Okay. Now, on November 1, 2012, what happened  
15 with regards to the case and this defendant?

16 A. The victim, Alyssa Velez, had a forensic  
17 interview.

18 Q. And were you there? Where was the forensic  
19 interview? Where did the forensic interview take place?

20 A. The forensic interview took place at the  
21 Children's Assessment Center in Houston.

22 Q. And are you familiar with the Children's  
23 Assessment Center?

24 A. Yes, ma'am.

25 Q. What is the Children's Assessment Center?

1           A.     The Children's Assessment Center is basically  
2 a -- it's a three-story building. It houses everyone  
3 from law enforcement, CPS, forensic interviewers, social  
4 workers. They have play rooms. It's basically  
5 dedicated to children.

6                     There at the assessment center, the  
7 children will go there. We make a loss -- peace  
8 officers and CPS workers make appointments for these  
9 children to be interviewed by a forensic interviewer.  
10 Forensic interviews are basically people who have been  
11 trained to talk to kids. Police officers do not talk to  
12 kids when it comes to sexual abuse.

13                    We make an appointment, they go and they  
14 sit down with an interviewer. Interviews can be  
15 anywhere from -- I would say the shortest I've been to  
16 one, maybe 15 minutes, all the way up to possibly an  
17 hour. And from that point, I sit in a separate room;  
18 it's just the interviewer and the child. And they speak  
19 back and forth, you know, about, you know, whatever it  
20 is they've come to talk to them that day.

21                    And I view it from a side room. I view it  
22 live, in most cases if I'm able to be there. And then I  
23 just watch while the interviewer just speaks to the  
24 child.

25           Q.     And were you able to watch this interview live?

1 A. Yes, I was.

2 Q. And then after the complainant spoke with a  
3 forensic interviewer at -- we will call it the CAC, the  
4 Children's Assessment Center, what happens? What  
5 happened after that?

6 A. In this particular case the next thing that  
7 happened was -- is Alyssa had a medical exam at the  
8 Children's Assessment Center. I'll say the CAC. The  
9 CAC also, I did fail to mention, has a medical clinic  
10 for kids to receive sexual assault exams.

11 Q. And after the sexual assault exam occurred  
12 you're clearly not in the room during that; is that  
13 right?

14 A. No, ma'am.

15 Q. But are you able to review the medical report  
16 afterwards?

17 A. Yes.

18 Q. After she completed her medical exam, what  
19 happened with this case? What was the next step?

20 A. The next step is for me for start setting up  
21 appointments to who I need to interview.

22 Q. And who was the first person that you  
23 interviewed in this case?

24 A. Alyssa's mother, Jeanie Sanchez.

25 Q. And when did you interview Jeanie Sanchez?



1 A. November 16, 2012.

2 Q. Okay. And was Jeanie Sanchez also the reportee  
3 in this case?

4 A. Yes, she was.

5 Q. What did you -- without talking about what she  
6 stated to you, what did you interview Ms. Sanchez about?

7 A. About what Alyssa had told her about what had  
8 occurred.

9 Q. And did she tell about the outcry that Alyssa  
10 had made to her about --

11 A. Yes, she did.

12 Q. And were you able to determine from  
13 Ms. Sanchez' statement to you around the date that this  
14 allegation of sexual abuse occurred?

15 A. Yes, she stated when she -- yes, ma'am. She  
16 did.

17 Q. And what date did you determine that this  
18 sexual abuse or allegation of sexual abuse occurred?

19 A. I'm going to have to look at my --

20 Q. Go ahead?

21 A. -- to make sure.

22 September 21, 2012.

23 Q. Now, after you interviewed Ms. Sanchez, was  
24 this after you were able to watch the interview, as well  
25 as see the medical results? Is that right?

1 A. I'm not sure about the medical results.

2 Q. Okay. But you were able to watch the forensic  
3 interview?

4 A. Yes, ma'am.

5 Q. And in the forensic interview, did the  
6 complainant make a statement with regards to what  
7 happened to her?

8 A. She did.

9 Q. Were you able to convey what the complainant  
10 stated in the forensic interview to her mother?

11 A. Yes, ma'am. I usually do, I don't remember  
12 exactly if I mentioned it.

13 Q. If you can remember, was Ms. Sanchez surprised  
14 about anything that was disclosed by the complainant in  
15 the forensic interview?

16 A. No, ma'am.

17 Q. Now, after you spoke with Ms. Sanchez, who did  
18 you speak with after that?

19 A. The next person I contacted was Jerry Cameron.

20 Q. Okay. And how did you first contact Jerry  
21 Cameron?

22 A. Through telephone.

23 Q. And was he willing to come in and speak with  
24 you?

25 A. Yes, ma'am.

1 Q. And when did he come in to speak with you at  
2 the police department?

3 A. December 17, 2012.

4 Q. Okay. So, December 17, 2012, is about three  
5 months after the alleged allegation; is that right?

6 A. Yes, ma'am.

7 Q. And when you interviewed him did you record it?

8 A. Yes, I did.

9 Q. Did you let him know that you were recording  
10 the interview?

11 A. I'm not sure if I told him that or not.

12 Q. Did you tell him -- was he under arrest? Did  
13 you Mirandize him? How did that go?

14 A. I told him he was free to leave any time he  
15 wanted, the door was unlocked, he was not under arrest,  
16 he was not going to jail.

17 Q. And did he still want to speak with you?

18 A. Yes, ma'am.

19 Q. And how was his demeanor throughout the  
20 interview?

21 A. It was good. I mean, he was -- he talked back  
22 and forth. You know, he answered questions when I  
23 asked.

24 Q. And were you the only detective in the room  
25 with him?

1           A.    No, there was another detective.  Detective  
2 Gallow.

3           Q.    And when the defendant came into the  
4 interview -- have you had a chance to interview with the  
5 defendant prior to testifying today?

6           A.    Yes.

7           Q.    Okay.  Do you remember what he wore?

8           A.    Yes, he had a black hat on, blue jeans, and, of  
9 course, he had his eye patch.  That's a distinctive  
10 eye --

11          Q.    Did he have his glasses on over his eye patch?

12          A.    Yes, he did.

13          Q.    And Jerry Mac Cameron, who came in to interview  
14 with you, is he sitting in the courtroom today?

15          A.    Yes, ma'am.

16          Q.    Can you identify him using an article of  
17 clothing and something distinctive that he is wearing?

18          A.    He's wearing a light blue shirt with a black or  
19 navy coat.

20                   MS. OSWALD:  May the record reflect the  
21 witness has positively identified the defendant?

22                   THE COURT:  The record will so reflect.

23          Q.    (BY MS. OSWALD) In that interview -- how do you  
24 generally conduct interviews with possible suspects?

25          A.    Non-custodian, meaning they're not under arrest

1 and they're free to leave whenever they choose.

2 Q. Okay.

3 A. I'm not making them be there.

4 Q. Okay. And do you start off just asking them  
5 about the incident or do you kind of talk about his  
6 background and kind of get a little bit more  
7 comfortable?

8 A. Yeah, I try to build some rapport just to find  
9 out who they are, you know, maybe a just little  
10 background. Like any other conversation with anyone  
11 else that I would have a conversation with.

12 Q. And did you ask him about the weekend that  
13 Alyssa and her sister went to stay at his home?

14 A. I did.

15 Q. And before we talk about that weekend did he  
16 describe his home to you?

17 A. Yes.

18 Q. And did he also name the address?

19 A. I'm not sure if he named the exact actual  
20 address.

21 Q. Okay. But did he mention the location where  
22 his house is at?

23 A. Yes, ma'am.

24 Q. And are you familiar with that location?

25 A. Yes, ma'am.

1 MS. OSWALD: Your Honor, may I approach?

2 THE COURT: You may.

3 Q. (BY MS. OSWALD) I'm handing you what's been  
4 marked as State's Exhibit 4. Do you recognize this?

5 A. Yes, ma'am.

6 Q. And how do you recognize it?

7 A. This is the Bay and Bayway, one of the main  
8 roads here in Baytown. And then Crow goes into Bayway.

9 Q. And did the defendant state to you that he  
10 lived off Crow Road?

11 A. Yes, he stated it was by -- on the bay.

12 Q. Did he, in fact, say that he can see the water  
13 from his home?

14 A. Yes.

15 Q. And are you familiar with this area in Baytown?

16 A. Yes, ma'am.

17 Q. And is this area in Baytown in Harris County?

18 A. Yes, it is.

19 MS. OSWALD: Tendering State's Exhibit 4  
20 to defense counsel at this time.

21 MS. BROWN: I'm going to object, Your  
22 Honor, because the item that's highlighted is not where  
23 his house is.

24 MS. OSWALD: Your Honor, it's 113 Crow is  
25 what's located; but I'm under the impression that he

1 lives on the same lot as 113 Crow, 113 1/2, or however  
2 it is.

3 THE COURT: I think you've clarified it.  
4 It's overruled. State 4 is admitted.

5 MS. OSWALD: Permission to publish at this  
6 time?

7 THE COURT: You may.

8 Q. (BY MS. OSWALD) Now, Detective Kelly, did you  
9 have a chance to go out to this location?

10 A. I did not.

11 Q. But the defendant did describe to you that his  
12 home is a home that is near the water, is that right?

13 A. Yes, ma'am.

14 Q. How did you come across the address 113 Crow  
15 Road?

16 A. Jeanie Sanchez provided that address.

17 Q. Okay. And that's the lot that we see right  
18 here, is that right?

19 A. Yes, ma'am.

20 Q. Now, the defendant stated that he doesn't -- to  
21 you, did he state to you that he lives in a smaller unit  
22 on that lot?

23 A. Yes, he told me he lived in a studio-sized  
24 house.

25 Q. Okay. So when he described the studio-sized

1 house to you, what did he mean by that?

2 A. Basically, it's one big room is what he said.

3 And then off his patio or porch he can see the bay.

4 Q. Okay. So it's not a very large house?

5 A. From what he described, but I have not been  
6 there.

7 Q. Okay. But he did tell you that it's one big  
8 room and possibly the only room that's separate is the  
9 bathroom, is that right?

10 A. Yes, ma'am.

11 Q. Okay. After you talked about where he lived,  
12 did you talk about the weekend that Alyssa and Catie  
13 came to stay?

14 A. Yes, ma'am.

15 Q. And who did he say that Catie was?

16 A. Catie is Alyssa's sister and his grandson  
17 Jacob's or Jake's girlfriend.

18 Q. Okay. And did he state how old Jake is?

19 A. I'm not sure, but I can refer to my notes and  
20 tell you.

21 Q. Okay.

22 A. So he was about 17 years old at that time.

23 Q. And do you know how old Catie was?

24 A. I have her date of birth, as well. I can look  
25 at it. About 15 years old.



1 Q. Now, did you have a chance to ask him about the  
2 weekend that Catie and Alyssa came to stay with him?

3 A. Yes, ma'am.

4 Q. And what did he say about that weekend?

5 A. He basically stated that Catie, and Jacob, and  
6 Alyssa came over to his house. And at that point,  
7 Alyssa was playing at the house and they were all  
8 basically -- he said they were hanging out.

9 Q. Okay. Did you ask directly about him playing  
10 with Alyssa?

11 A. He told me about playing with her, that he was  
12 good with kids and played with her. They were having a  
13 good time while she was at his house.

14 Q. And did he ever state what people call him,  
15 like his grandkids and young kids? Did he have a kind  
16 of nickname for himself?

17 A. Pappa Mac.

18 Q. Did he, himself say, I'm Pappa Mac?

19 A. Yes. He said he's commonly referred to as  
20 Pappa Mac.

21 Q. Did he refer to himself as Pappa Mac on few or  
22 may occasions in your interview?

23 A. I remember a couple of times.

24 Q. Now, you were talking about him playing  
25 specifically with Alyssa. Did he say anything about how

1 he played with her?

2 A. He said he was throwing her around because he  
3 said he just played rough with kids. He stated he  
4 goosed her, which he defined as tickling.

5 Q. And did you ask where he ended up tickling her?

6 A. He said her stomach.

7 Q. Did you ever ask if he tickled her below her  
8 waist?

9 A. I did.

10 Q. And what did he say?

11 A. He said, No, unless it was an accident.

12 Q. Did you ever ask if he had any sort of contact  
13 with her underwear or her panties?

14 A. Yes. He said he popped her panties.

15 Q. And what did he say "popping" her panties  
16 meant?

17 A. You know with talking with him, you know, the  
18 way I kind of interpreted it was, you know, grabbing,  
19 like, the top of the panties and pulling it back with  
20 elastic and then popping back on the skin.

21 Q. And did he describe what she was wearing when  
22 he had access to be able to pop the elastic of her  
23 panties?

24 A. He remembered saying that she had on a dress.

25 Q. And did you ask him how he even saw her panties

1 with her in her dress?

2 A. Well, he was -- he was talking about how he was  
3 roughing her around and kind of throwing her around. So  
4 I don't remember specifically, but her panties would be  
5 able to be seen under her dress and she didn't have  
6 shorts on.

7 Q. And did he say or tell you where he ended up  
8 playing, kind of roughhousing with her? Was it on his  
9 couch or his bed?

10 A. If I can refer to my notes, I do not remember.

11 He stated he had threw Alyssa on the bed.

12 Q. So he did state that he at one point was  
13 playing with her on his bed, is that right?

14 A. Yes, ma'am.

15 Q. Okay. Did you ever ask him to kind of talk  
16 about further why she would be saying that he had  
17 touched her vagina?

18 A. He just talked about, you know, how he was  
19 goosing her and playing with her.

20 Q. And so when you asked him -- did you ever, you  
21 or Detected Gallow, ever ask him, Why would she say you  
22 touched her vagina? What was his response to that?

23 A. He said that her mother would tell -- had told  
24 her to say it.

25 Q. And did he deny having done that?

1 A. Yes, he denied it.

2 Q. And when he denied it would he say anything  
3 else with the denial?

4 A. He would say, No, but if I did, I didn't mean  
5 to. It would be an accident. I wouldn't mean to do  
6 that.

7 Q. Did you ever get a direct, No, I never did  
8 that. There was never a chance I could have done that?

9 A. No.

10 Q. You just mentioned that he did say something  
11 about Jeanie Sanchez, the complainant's mother; is that  
12 right?

13 A. Yes, ma'am.

14 Q. Did he kind of give you his opinion about her?

15 A. Yes, he did.

16 Q. And what was his opinion about her?

17 A. He said she was a chronic arguer, she just  
18 liked to argue a lot and debate.

19 Q. How many times had he told you he had met her  
20 prior to that weekend?

21 A. One time.

22 Q. And did he tell you if it was a good or bad  
23 interaction?

24 A. He said they had a debate at the time that they  
25 met.

1 Q. But they didn't really know each other on a  
2 regular basis?

3 A. No, he didn't remember what they had argued  
4 about.

5 Q. Now, when he was talking about Jeanie Sanchez  
6 or the complainant's mother, where was he kind of  
7 getting all of his information that she is a chronic  
8 arguer and that she maybe told Alyssa to say this?

9 A. He mentioned his grandson and Catie.

10 Q. Now, how many times did you directly ask him  
11 about the complainant's allegation that he touched her  
12 vagina, if you can remember? Was it a few times or one  
13 direct time?

14 A. It was more than once.

15 Q. Okay. And did he ever just give you a flat out  
16 denial that, I never did this?

17 A. No, ma'am.

18 Q. What was generally his answer to that question?

19 A. It was generally, I didn't mean to do anything.  
20 I didn't do that. If I did, you know, it was an  
21 accident.

22 Q. Did you have a chance at the very end of the  
23 interview to talk with him about his time in the Marines  
24 and his time, you know, when he had his first cigarette?

25 A. Yes, my -- the other detective, because he is a

1 Marine, they had that discussion.

2 Q. And how did the defendant's memory seem to be  
3 in talking about those, those incidences?

4 A. Very well. He remembered those, a lot of  
5 detail.

6 Q. And how was his memory with regard to the  
7 weekend that occurred just three months prior?

8 A. Some things he remembered, some things he  
9 didn't.

10 Q. Did you have a chance to talk with Jacob Davis,  
11 the defendant's grandson?

12 A. I did.

13 Q. And when was that?

14 A. The same day that I spoke to Mr. Cameron.

15 Q. And was that interview also being taped?

16 A. Yes, it was.

17 Q. And how was Jacob's demeanor in that interview?

18 A. He was just kind of -- I guess kind of laid  
19 back, just kind of solemn.

20 Q. And did you find out where he was living at the  
21 time of that interview on December 17th?

22 A. He basically told me he was living from place  
23 to place. He had lived at Jeanie Sanchez' house for a  
24 short time and he would stay -- he said he would stay  
25 with Mr. Cameron, as well, sometimes.

1 Q. But he didn't have a solid address for you to  
2 contact him?

3 A. No.

4 Q. Did you have a chance to ever interview Catie  
5 Sanchez, or Catalina Sanchez, Jeanie Sanchez' older  
6 daughter?

7 A. I did not interview her.

8 Q. Why did you not interview her?

9 A. I just didn't.

10 Q. Now, at the end of all of this interview did  
11 you end up ever getting a chance to look at the med, the  
12 medical results?

13 A. I did.

14 Q. And was there anything from the medical  
15 results, evidentiary wise, to help you in this case?

16 A. Not from a medical perspective.

17 Q. In all of your times investigating these kinds  
18 of cases, have you investigated few or many?

19 A. Many.

20 Q. Is that uncommon to not have medical results to  
21 confirm?

22 A. Right. It's often not, rather than, you know,  
23 is.

24 Q. Yeah, you're more often have --

25 A. No evidence to, you know, show either way.

1 MS. OSWALD: Pass the witness, Your Honor.

2 THE COURT: From the defense, please.

3 **CROSS-EXAMINATION**

4 BY MS. BROWN:

5 Q. Detective, I do have a few questions for you.  
6 Regarding the questions that you asked of Mr. Cameron --

7 A. Uh-huh.

8 Q. -- did you clarify to him, specifically, that  
9 you were talking about an allegation of a penetration  
10 inside the child? Or did you mention touching, in  
11 general, because it sounds to me like you were asking  
12 him, Did -- you know, when he was tickling, is it  
13 possible that he accidentally touched her below? And he's  
14 saying, I threw her up into the air onto the bed and,  
15 you know, maybe what it was, he was trying to catch her  
16 or make sure she didn't fall wrong, that his hand might  
17 brush the --

18 MS. OSWALD: Objection, compound nature of  
19 the question.

20 THE COURT: Actually, it's not a question.  
21 It's a statement. Ask a question.

22 Q. (BY MS. BROWN) Let me clarify. Is it possible  
23 he was responding to what he was thought was a question  
24 could his hand have accidentally brushed the outside  
25 front of her clothing?



1 A. Yes, that's possible.

2 Q. So you didn't spell it out for him that you  
3 were talking about penetration, did you?

4 A. I told him that Alyssa said that -- that she  
5 said that he touched her vagina.

6 Q. My understanding, from listening to your  
7 questions, you said that -- you asked him might he  
8 accidentally have touched and it was left unsaid whether  
9 you meant clothed or unclothed, let alone anything else?

10 A. We didn't speak about clothing.

11 Q. Okay. So he could have thought that you were  
12 talking about could he have brushed against the outside  
13 of her clothing?

14 MS. OSWALD: Objection, speculation.

15 THE COURT: That's sustained.

16 A. It's possible --

17 THE COURT: Excuse me. I've sustained it.  
18 You don't answer it.

19 Q. (BY MS. BROWN) What do you think he thought  
20 your question meant?

21 MS. OSWALD: Objection, speculation.

22 THE COURT: Sustained.

23 Q. (BY MS. BROWN) To be clear, you never said the  
24 word "naked" or unclothed to him, did you?

25 A. No.

1 Q. Have you ever known an older person that you're  
2 questioning to vividly remember the past, but have  
3 trouble with their short-term memory, more recent  
4 events?

5 A. Depending on the person, yes.

6 Q. Is that something that does occur in some  
7 individuals with age?

8 A. Yes.

9 Q. Okay.

10 MS. BROWN: I pass the witness.

11 MS. OSWALD: Nothing further from this  
12 witness, Your Honor.

13 THE COURT: Is he to be excused?

14 MS. OSWALD: Yes, sir.

15 THE COURT: Any objection?

16 MS. BROWN: No objection, Your Honor.

17 THE COURT: All right. You are excused,  
18 sir. Thank you for your testimony.

19 Your next witness, please.

20 MS. OSWALD: State calls Catie Sanchez or  
21 Catalina Sanchez to the stand.

22 THE BAILIFF: Your Honor, this witness has  
23 not been sworn in.

24 THE COURT: Raise your right hand, please.

25 (Witness sworn.)

1 THE COURT: All right. From the State,  
2 please.

3 MS. OSWALD: Thank you, Judge.

4 **CATALINA SANCHEZ,**  
5 having been first duly sworn, testified as follows:

6 **DIRECT EXAMINATION**

7 BY MS. OSWALD:

8 Q. Catie, will you please introduce yourself to  
9 the jury and spell your first name.

10 A. My name is Catalina, C-a-t-a-l-i-n-a. And I'm  
11 the big sister of Alyssa Velez.

12 Q. Now, does everybody call you Catie, Catalina?

13 A. They call me Catie.

14 Q. Catie, the lady in front of you is a court  
15 reporter. She's taking down everything that we are  
16 saying, okay. So when I ask you a question, you just  
17 wait until I ask you and then you can answer. Okay?

18 A. Yes, ma'am.

19 Q. All right. Now, Catie, how old are you?

20 A. I'm 17.

21 Q. And what grade are you in?

22 A. 11th.

23 Q. What high school do you go to?

24 A. La Porte High School.

25 Q. And what's your favorite subject in high