

1 some work hours that were a bit more strange. Not your
2 typical 8:00 to 5:00 or 9:00 to 5:00 hours. And because
3 of that, he would many times be in the driveway or in
4 the home. Therasa would see him and say hello, but she
5 wasn't as close to him as she was Marie.

6 Now, on October 27th, 2009, Therasa dropped
7 Ryleigh off. Ryleigh stayed the day there. There
8 weren't any phone calls or problems during the day that
9 Therasa was notified about. And she went to pick
10 daughter Ryleigh up at the end of the day when she got
11 off of work, where she was a counselor at one of the
12 local schools.

13 You're going to find out that Ryleigh was
14 in the car, like any other day, they began to drive
15 home, just her and Therasa in the vehicle. The other
16 boys were still at school. And as they listened to
17 music and drove that daily drive, you're going to find
18 out that Ryleigh turned to her mom and out of nowhere
19 said: Mom, Bobby licked my gina. Just like that.
20 You're going to hear about Therasa's shock. She knew
21 what gina meant. She knew that was the term that she
22 had taught her daughter, Ryleigh, to use for her vagina.

23 She kind of stopped for a moment,
24 processing what Ryleigh told her, a bit in shock. She
25 asked Ryleigh: Ryleigh, what did you say? And out of

1 Ryleigh's 3-year-old little mouth, she said: Mom, Bobby
2 licked my gina. And this time, perhaps, Ryleigh didn't
3 think that her mom understood what she was talking about
4 and so she began to demonstrate exactly what Bobby had
5 done to her.

6 Therasa drove home, talked to her husband
7 after he got off work. She told husband about what
8 Ryleigh had told her. She just -- she didn't know what
9 to do. She didn't know how to handle what had been told
10 to her. At first they decided they were going to call
11 Marie. They asked Marie: Marie, were you out today?
12 Were you not in the daycare the entire time? Ryleigh
13 says you weren't. They got confirmation that, in fact,
14 Marie hadn't been at the daycare for a portion of the
15 day. And then they picked up the phone and the next
16 person they called was the police.

17 You're going to find out that over the next
18 few days, Ryleigh had to tell her story several
19 different times, that she had to talk to the nurses at
20 the hospital where she was examined. She had to talk to
21 a forensic interviewer. She had to talk to a therapist
22 in the weeks and months after she made the disclosure.

23 You're going to find out that in January of
24 2010, Ryleigh stopped having to talk about this. She
25 was done with therapy. She began to move on with her

1 life. She was only 3 years old at the time. And today
2 she will come before you and she is now almost 7 years
3 old. I anticipate she's going to tell you that in the
4 last three years, she's not only unable to tell you
5 about what happened back then, but she's unable to tell
6 you really anything about Ms. Marie's house or daycare.

7 Because of that, what you are going to hear
8 from are all of the witnesses, all of the people who got
9 to talk to Ryleigh back then, back when she was able to
10 tell her story, when she was able to remember what had
11 happened to her. You're going to get to hear from her
12 mom, Therasa Launer, about that day she drove home.
13 You're going to get to hear from the forensic nurse
14 examiner at Katy Memorial Hermann Hospital who talked to
15 Ryleigh that very night and asked her: What happened to
16 you today? And Ryleigh's response: Well, Bobby licked
17 my gina. And how Ryleigh was able to demonstrate for
18 the nurse exactly where and how Bobby had touched her.

19 You're going to get to hear from the
20 forensic interviewer, Susan Odhiambo, who was able to
21 meet with Ryleigh just a few days after the police were
22 called. You're going to be able to hear from a
23 therapist who met with her up until January of 2010.
24 She's going to be able to talk to you about that time
25 spent with Ryleigh and about what Ryleigh was able to

1 tell. You're going to get to hear about the evidence
2 that was collected in the case.

3 At the end of the trial, I'm going to ask
4 that you find Bobby Peyronel guilty and hold him
5 responsible for the actions he chose to commit on
6 October 27th, 2009.

7 MR. OLIVER: Your Honor, defense reserves
8 its right to open during its case-in-chief.

9 THE COURT: All right. You may call your
10 first witness.

11 MS. COLLINS: At this time, the State will
12 call Deputy Laetsch to the stand.

13 THE COURT: You may proceed.

14 MS. COLLINS: Thank you, Your Honor.

15 **JOHN LAETSCH,**
16 having been first duly sworn, testified as follows:

17 **DIRECT EXAMINATION**

18 **BY MS. COLLINS:**

19 Q. Can you please state your name for the Court?

20 A. John Laetsch.

21 Q. What do you do for a living?

22 A. I'm a deputy with the Harris County Sheriff's
23 Office.

24 Q. How long have you been with the Harris County
25 Sheriff's Office?

1 A. Twenty-one years.

2 Q. When you first started working at the Harris
3 County Sheriff's Department, was that your first job or
4 did you have prior experience somewhere else?

5 A. I worked for Cedars before I came to the
6 sheriff's office.

7 Q. When you came to work for the sheriff's
8 department, was there some training that you had to go
9 through to be able to be a deputy?

10 A. Yes, ma'am. I went through a police academy at
11 the Houston Community College.

12 Q. How long is that academy?

13 A. At that time, it was four months.

14 Q. What kinds of things did you learn about at the
15 academy?

16 A. The different laws, how to investigate
17 offenses, how to write reports, how to clear houses,
18 traffic stops. Pretty much everything.

19 Q. At the end of that time at the academy, is
20 there like a test like you have to pass to get out of
21 school or something like that?

22 A. Yes, ma'am. I had to pass a test to graduate
23 from the academy. Then once I have the -- a graduation
24 certificate from the academy, I have to pass the state
25 exam to become a certified peace officer.

1 Q. Did you do those things?

2 A. Yes, ma'am.

3 Q. How long have you been a certified peace
4 officer?

5 A. Since January of 1995.

6 Q. Sir, over your years at the sheriff's
7 department, have you been in many divisions or one main
8 division?

9 A. I worked in the jail for eight-and-a-half years
10 and I've been on patrol for thirteen.

11 Q. Okay. Let's talk about patrol. What does that
12 mean when you work patrol?

13 A. In patrol, I drive around in a marked patrol
14 unit, police car, and enforce traffic laws. I get
15 dispatched to calls ranging from a 911 hang-up or a
16 house alarm that's gone off to a shooting to thefts to
17 everything.

18 Q. Now, working patrol you said that you responded
19 to 911 calls. Is that right?

20 A. Yes, ma'am.

21 Q. Okay. Now, are you the guy who does like the
22 follow-up investigation, like what we think of as a
23 detective?

24 A. No, ma'am. I am a patrol officer. I make the
25 initial contact with the reportee or the complainant and

1 I do an initial report. And if there is -- if I'm able
2 to gather enough information on that initial report to
3 file charges, I contact the Harris County District
4 Attorney's Office to see if they will accept charges.
5 If not, then I will refer it to our detective unit.

6 Q. Okay. When you are out on patrol, do you
7 patrol by yourself or do you have like a partner?

8 A. I patrol by myself. We're all single units.

9 Q. Okay. Back in October of 2009, were you
10 working patrol at that time?

11 A. Yes, ma'am.

12 Q. Specifically, on October 27th, 2009, were you
13 called out to the scene of a crime?

14 A. Yes, ma'am.

15 Q. Okay. And where were you called out to?

16 A. I was called out to a location on Pepperell
17 Place at approximately 5 o'clock in the afternoon on a
18 possible sexual assault of a child call.

19 Q. You said 5:00 p.m. Like around dinner time?

20 A. Yes, ma'am.

21 Q. Now, when you got to that scene, did you locate
22 the person who had called the police?

23 A. Yes, ma'am.

24 Q. Okay. Who was that person?

25 A. That person was the reportee, Therasa Launer.

1 Q. In the course, did you have an opportunity to
2 talk to her?

3 A. Yes, ma'am, I did.

4 Q. Okay. Now, between the time -- you said you
5 received a call around 5:00. Is that right?

6 A. Yes, ma'am.

7 Q. Did it take you a long time to get out there or
8 a little time?

9 A. Probably 15, 20 minutes.

10 Q. Okay. When you got out there, did you -- how
11 much time did you spend talking to Therasa Launer?

12 A. Probably 20, 25 minutes.

13 Q. Okay. Now, I know this has been awhile.

14 A. Uh-huh.

15 Q. Do you remember much about the details of you
16 being called out to talk to Therasa Launer?

17 A. No, ma'am. I'll be honest, I do not.

18 Q. Okay. Can you tell me, in the course of your
19 communications with Ms. Launer what crime did you
20 believe may have been committed?

21 A. Talking to Ms. Launer, the information she
22 provided to me, I believe there could have been a sexual
23 assault of a child committed.

24 Q. You mentioned that your responsibility is to
25 take that initial report and then send it to the

1 appropriate division, wherever that might be.

2 A. Yes, ma'am.

3 Q. Did you do that in this case?

4 A. Yes.

5 Q. Okay. Now, do you remember anything about
6 Ms. Launer's demeanor or who was in the house when you
7 went out there?

8 A. No, ma'am, I don't.

9 Q. Do you remember if you gave her any
10 instructions on what she needed to do to follow through
11 with the possible sexual assault of a child crime?

12 A. Yes, ma'am. I advised her that since the
13 offense had occurred earlier that day, according to what
14 she had told me, she should take her child to Memorial
15 Hermann Katy Hospital and have a sexual assault evidence
16 kit done, completed.

17 Q. Why did you tell her to go do that?

18 A. Well, because there may still be -- if there
19 was any evidence, it may still be there, be present.
20 And I know that that hospital has nurses that are
21 trained in gathering such evidence.

22 Q. Do you know whether or not they did that?

23 A. I do not know.

24 Q. Okay. You don't like accompany the person to
25 the hospital or anything?

1 A. No, ma'am.

2 Q. Okay. Do you know whether or not you spoke to
3 anybody besides Therasa Launer that day?

4 A. Well, I spoke to my supervisor over the phone,
5 advised him what was being told to me, and he --

6 MR. OLIVER: I object to hearsay, Your
7 Honor.

8 THE COURT: Overruled at this time.

9 Q. (By Ms. Collins) Let me ask you this, Deputy.
10 Did you talk to anybody else who lived in the house
11 besides Therasa?

12 A. No, ma'am.

13 Q. Did you speak to the person who was the victim
14 of this crime?

15 A. No, ma'am.

16 Q. Were you given the name of someone that was
17 believed to be the victim of this crime?

18 A. Yes, ma'am.

19 Q. What was that name?

20 A. That name was Ryleigh Launer, the reportee's
21 3-year-old daughter.

22 Q. Now, Deputy, if there is a victim right there
23 in the home, is there a reason that you didn't talk to
24 her?

25 A. Yes, ma'am. Because while I'm trained in law

1 enforcement, investigating certain crimes, our
2 investigators that deal with child abuse victims have
3 advised us to get the back information and then refer it
4 to them. They will take the case and they will --
5 because they have extensive training in even talking
6 with small children about such incidents and they will
7 do an interview with the child at a later date.

8 Q. After you gave Ms. Launer the instruction to
9 take her daughter to the hospital, did you have any
10 further contact with the family that day?

11 A. No, ma'am.

12 Q. Did you have any further contact with this
13 case?

14 A. No, ma'am.

15 Q. Sir, while you were out there, did you get the
16 name of a possible suspect for this case?

17 A. Yes, ma'am.

18 Q. What was that name?

19 A. That name was Bobby Peyronel.

20 Q. Did you ever have any contact with him?

21 A. No, ma'am.

22 Q. One last question, Officer. Did you get an
23 address where this crime would have occurred?

24 A. Yes, ma'am.

25 Q. And what was that address?

1 A. 22150 Pearl Lake.

2 Q. Are you familiar with that address?

3 A. I know the general area where the address is.
4 I don't know the exact house.

5 Q. Fair enough.

6 Can you tell us whether or not it's in
7 Harris County, Texas?

8 A. Yes, ma'am.

9 Q. Yes, ma'am, you can, or, yes, it is --

10 A. Yes, it is in Harris County.

11 Q. Thank you very much.

12 MS. COLLINS: Pass the witness.

13 THE COURT: All right.

14 MR. OLIVER: If it please the Court.

15 **CROSS-EXAMINATION**

16 **BY MR. OLIVER:**

17 Q. Good morning. Officer Laetsch?

18 A. Deputy Laetsch.

19 Q. Deputy Laetsch.

20 Okay. My name is Rick Oliver. I'm going
21 to ask you some questions. Okay?

22 A. Okay.

23 Q. In your direct testimony, you told the Court
24 and this jury that you received some training in
25 investigation, correct?

1 A. Yes, sir.

2 Q. Went to the academy?

3 A. Yes, sir.

4 Q. In the academy, one of the things they focus on
5 and teach you how to do correctly is to write a report,
6 correct?

7 A. Yes, sir.

8 Q. And the basic understanding is that we know in
9 the justice system if you're going to get to this point,
10 like a trial, that could be years down the road, months
11 down the road, right?

12 A. Yes, sir.

13 Q. You would agree with me that your memory about
14 details is going to be better closer to an event than
15 further away?

16 A. Yes, sir.

17 Q. So, it's important that that offense report
18 capture all the details that you can observe?

19 A. Right.

20 Q. And you would agree with me that a true,
21 complete, and correct offense report will have all those
22 details, correct?

23 A. Yes, sir.

24 Q. And a true, complete offense report is going to
25 document anything you see rather, correct?

1 A. Yes, sir.

2 Q. And not just things that support the
3 allegation, correct?

4 A. Yes, sir.

5 Q. Because sometimes your job is to gather details
6 that might exonerate a person accused of a crime, right?

7 A. Yes, sir.

8 Q. Okay. Is there anything about the offense
9 report that you created in this case that you would like
10 to change, add to, or subtract from before we get
11 started?

12 A. No, sir.

13 Q. Okay. I'll refer you to the line of
14 questioning the district attorney asked you about at the
15 beginning where she asked you if you were dispatched to
16 the scene of a crime. Do you recall that question?

17 A. She asked me if I was dispatched to a call.

18 Q. She asked you if you were dispatched to a scene
19 of a crime. Do you recall that question?

20 A. I don't recall it as a scene of a crime. I was
21 dispatched to --

22 Q. If she referred to it as a scene of a crime,
23 you'd agree that's not correct?

24 A. Yes, sir.

25 Q. You were dispatched to a call?

1 A. I was dispatched to a call.

2 Q. The reason I'm saying that is because at that
3 point when you were driving over there, you didn't have
4 any information, correct?

5 A. No, sir.

6 Q. You knew nothing about it?

7 A. Except the few comments that our dispatcher put
8 on the call slip.

9 Q. And those comments were the address?

10 A. The address of the call I was going to, which
11 is where the reportee was.

12 Q. Time of call?

13 A. Yes, sir.

14 Q. Basic information as to the substance --

15 A. The substance, yes, sir.

16 Q. Now, you received -- did you arrive -- you
17 arrived at their residence, at the residence
18 approximately 4:52 p.m. on October 27th, 2009; is that
19 correct?

20 A. That was the time the call was reported. And
21 so, it would have been a little after 5:00 when I got
22 there.

23 Q. So, what you're saying is that the dispatch got
24 this call at 4:52, right?

25 A. Correct.

1 Q. Can you tell the jury about what time you made
2 that scene?

3 A. Approximately 10, 15 minutes later.

4 Q. So, a little after 5:00?

5 A. A little after 5:00.

6 Q. Did you get stuck in traffic on the way or
7 anything?

8 A. I don't recall. I --

9 Q. Do you recall if you had your siren on, on your
10 way?

11 A. No, sir.

12 Q. No, you didn't, or you don't recall?

13 A. I did not have it on.

14 Q. Did you have your overhead lights on?

15 A. No, sir.

16 Q. Now, one other thing that I'll direct your
17 attention to. The district attorney asked you if you
18 identified a, quote, victim. Do you recall that
19 question?

20 A. Yes, sir.

21 Q. You would agree with me that you don't know at
22 that point if there's a victim or not?

23 A. A victim was -- the reportee stated her
24 daughter was a victim or she felt her daughter was a
25 victim.

1 Q. You had not, at that point in time, made any
2 determination as to the validity of that claim?

3 A. No, sir.

4 Q. At that point in time, you would agree with me,
5 that she was not a victim as far as you knew?

6 A. Correct.

7 Q. Now, your testimony earlier was that you were
8 at this location for 20 -- actually, strike that. I'm
9 sorry.

10 Your testimony on direct was that you spoke
11 to Ms. Launer for 20 to 25 minutes. Do you recall that
12 testimony?

13 A. Yes, sir.

14 Q. Were you inside the house or outside the house?

15 A. Inside the house.

16 Q. In which room?

17 A. I do not recall.

18 Q. Do you recall how many cars were in the
19 driveway when you arrived?

20 A. No, sir.

21 MS. COLLINS: Objection. Relevance.

22 THE COURT: Overruled.

23 Q. (By Mr. Oliver) And you said you don't recall
24 seeing if anybody else was in the house?

25 A. Right.

1 Q. And you also said that you did not speak to the
2 complainant?

3 A. Correct, I did not speak to her.

4 Q. Now, you would agree with me that observing
5 someone's demeanor is not the same thing as a
6 conversation with them, correct?

7 A. Correct.

8 Q. And would you agree with me that certain
9 details about a person's demeanor or how they're acting
10 could be important if you're trying to determine if
11 something truly happened?

12 A. Yes, sir.

13 Q. Let me give you an example. If you had seen
14 the complainant crying or playing with toys or watching
15 cartoons, wouldn't that be a detail you think the jury
16 would want to know?

17 A. Yes, sir.

18 Q. But we don't have those details?

19 A. No, sir.

20 Q. You don't recall on this date if she was in the
21 room?

22 A. Right.

23 Q. But she could have been?

24 A. She could have been. I don't -- I don't
25 recall.

1 Q. And that's because you didn't put it in your
2 offense report, right?

3 A. Right.

4 Q. Now, you spoke to Ms. Launer for 20, 25
5 minutes, correct?

6 A. Yes, sir.

7 Q. Is the substance of everything she said in the
8 offense report or did you take selected portions of it?

9 A. No. I put down what she told me.

10 Q. Now, you gave them some instructions, correct?

11 A. Yes, sir.

12 Q. Those instructions were to take the complainant
13 to the hospital, correct?

14 A. Yes, sir.

15 Q. And was that at the end of the 25 minutes?

16 A. Yes, sir.

17 Q. Did you give her any other instructions?

18 A. Other than I gave her a case number and said it
19 would be referred to our investigators and they would be
20 contacting her at a later date.

21 Q. You testified you spoke to your supervisor,
22 correct?

23 A. Yes, sir.

24 Q. Without discussing the content of that
25 discussion, what you asked them was to see if those

1 investigators you talked about would make the scene,
2 correct?

3 A. Correct.

4 Q. They advised you they would not?

5 A. They would not make the scene that day.

6 Q. Did they give you any reason for that?

7 A. No, sir.

8 Q. You testified the purpose of those
9 investigators is so that some highly-trained
10 professional could conduct the interview in the correct
11 way?

12 A. Yes, sir.

13 Q. They chose not to do it that day?

14 A. Yes, sir.

15 Q. They could have made the same observations
16 about the child's demeanor or what she was doing or how
17 she was behaving on that day, correct?

18 A. Yes, sir.

19 Q. We don't have that information to show this
20 jury, do we?

21 A. No, sir.

22 Q. You indicated in your direct testimony that
23 Ms. Launer told you she picked up Ryleigh about 3:00
24 p.m. Did you ask for more specific detail than 3:00
25 p.m.?

1 A. No, sir.

2 Q. Did you ask her where she went after she picked
3 Ryleigh up?

4 A. No, sir.

5 Q. Did you ask her anything about the context of
6 the conversation she had with Ryleigh in the car?

7 A. I didn't ask her. She told me what Ryleigh had
8 told her in the car.

9 Q. So, she said the comment was just out of the
10 blue?

11 A. Yes.

12 Q. Did you ask if she had had any conversation at
13 all before that?

14 A. No, sir.

15 Q. Did you ask Ms. Launer if she had asked her
16 daughter about anything else that went on that day?

17 A. No, sir.

18 Q. So, she made those two comments about what her
19 daughter said and that's what you wrote down?

20 A. Yes, sir.

21 Q. Asked no additional details?

22 A. No, sir, not about that conversation.

23 Q. So, you would agree with me that in the way
24 we've come to understand an investigation, that's not
25 what you were out there to do, correct?

1 A. Correct. I had a lady that called in about a
2 possible offense --

3 MR. OLIVER: Your Honor, I object as
4 nonresponsive.

5 THE COURT: Overruled.

6 Q. (By Mr. Oliver) Deputy Laetsch, I'm going to
7 ask again. Would you agree with me that you did not
8 conduct an investigation?

9 A. Correct.

10 Q. And you made no attempt to contact the person
11 accused of this offense, did you?

12 A. No, sir.

13 Q. Deputy Laetsch, did you ask Ms. Launer anything
14 about whether her daughter had changed clothes or
15 anything?

16 A. No, sir.

17 Q. Did you give her any instructions about, you
18 know, preserving evidence, the things that you learned
19 in the academy about all the investigations, and
20 whatnot?

21 A. No, sir.

22 MR. OLIVER: Pass the witness, Judge.

23 MS. COLLINS: I'll be brief, Judge.

24 **REDIRECT EXAMINATION**

25 **BY MS. COLLINS:**

1 Q. Deputy, when you were called out to talk to
2 Therasa Launer, why were you called out there?

3 A. I was called out there because she -- after
4 talking with her daughter, she felt a criminal offense
5 had been committed.

6 Q. Okay. When you got there and you called to
7 have someone to come out, who is that group of people
8 who possibly come out to where you are?

9 A. Our sexual -- our child abuse investigators.

10 Q. Okay. When you have someone come out to the
11 scene -- I'm going to use TV language here for a
12 moment -- are those basically your CSI type of folks
13 that you want to come out and possibly collect evidence?

14 A. Yes, ma'am.

15 Q. Okay. Now, the location you were at with
16 Therasa Launer, did you believe a crime had occurred
17 there?

18 A. No, ma'am.

19 Q. Was there any evidence at that property that
20 you felt like could be collected?

21 A. No, ma'am.

22 Q. Who was the only thing or person who had come
23 from the crime scene?

24 A. The victim.

25 Q. Did you tell the victim's mother to take her to

1 the hospital so she could be examined for evidence?

2 A. Yes, ma'am.

3 Q. Now, Deputy, hear me out here. I'm assuming --
4 tell me if I'm wrong -- that you didn't ask detailed
5 questions, that you didn't do that because you're some
6 kind of slacker, right?

7 A. No.

8 Q. There's a purpose for you not going into
9 detailed questions with her mom?

10 A. Yes.

11 Q. Can you tell us why you didn't go in further
12 detailed questions with Therasa Launer?

13 A. I didn't go into any further details that may
14 jeopardize or contradict something that could be
15 determined later, later on.

16 Q. Do you have recording equipment at the scene?

17 A. No, ma'am.

18 Q. When we're taking official statements, do we
19 prefer them to be recorded or not recorded?

20 A. Prefer them to be recorded.

21 Q. Did you have the ability to do one of those
22 official recordings of an interview at that location?

23 A. No, ma'am.

24 MS. COLLINS: Pass the witness, Your Honor.

25 MR. OLIVER: Briefly, Judge.

RECROSS-EXAMINATION

1

2 **BY MR. OLIVER:**

3 Q. Deputy Laetsch, you said just a second ago
4 something I want to talk about. What I want to direct
5 your attention to is the comment or the answer that you
6 gave the State where you said: I don't ask additional
7 questions because I can jeopardize or contradict
8 something later on. Do you recall saying that?

9 A. Yes, sir.

10 Q. You've been doing this, you said, for 21 years,
11 right?

12 A. Yes, sir.

13 Q. There have been lots of investigations in your
14 past that were conducted with just a pen and a notepad,
15 correct?

16 A. Correct.

17 Q. In fact, you've written complete offense
18 reports using nothing more than those notes, correct?

19 A. Yes, sir.

20 Q. In fact, testified to the notes that became the
21 offense report, correct?

22 A. Yes, sir.

23 Q. And so, the fact that you didn't have a video
24 camera or recording equipment doesn't mean you can't
25 talk to the people that you need to talk to, correct?

1 A. Correct.

2 Q. When you say jeopardize or contradict, am I
3 correct -- if I'm hearing that right -- in saying that
4 if the complainant tells you something you don't want to
5 ask that question in case they say something different
6 down the road?

7 A. No, sir. Especially when dealing with a
8 3-year-old child, that child can tell me one thing at
9 the scene and as far as that child is concerned, that's
10 the truth. But my understanding, as a police officer,
11 it can be intimidating and we've been instructed by our
12 investigators --

13 Q. Let me stop you for one second. You didn't
14 have your gun out pointed at anybody, did you?

15 A. No, sir.

16 Q. You didn't have your flashlight pointing at
17 anybody's eyes?

18 A. No, sir.

19 Q. So, you would agree you did not approach this
20 in a manner intended to intimidate anybody, right?

21 A. No, sir, I didn't.

22 Q. So, I want to ask you a question. If you ask
23 me a question and I give the same answer three, four,
24 five times, would you agree that I've just given a
25 consistent answer?