

1 Squyres.

2 THE COURT: Deputy Squyres. Please come  
3 right down here. Please raise your right hand to be  
4 sworn in.

5 (Witness sworn.)

6 THE COURT: Please have a seat.

7 Ms. Buese, you may proceed.

8 MICHAEL SQUYRES

9 Having first been duly sworn, testified as follows:

10 DIRECT EXAMINATION

11 BY MS. BUESE:

12 Q. Sir, could you introduce yourself to the jury?

13 A. My name is Deputy Michael Squyres.

14 Q. And how are you employed?

15 A. I'm employed as a deputy investigator with the  
16 Harris County Sheriff's Department.

17 Q. Where are you currently assigned?

18 A. I'm assigned to the gang intelligence unit.

19 Q. And can you tell the jury a little bit about  
20 the training and experience that you have specific to  
21 investigating gang members and gang groups.

22 MR. HINTON: Before this deputy starts  
23 testifying, Judge, I would like to make an objection to  
24 what I presume he's going to testify, his testimony is  
25 going to consist of, and I would object or asked the

1 Court to make a ruling under 403. I want to object that  
2 its prejudicial value outweighs its probative value and  
3 would asked the Court to make a balancing test, Your  
4 Honor, under 403?

5 THE COURT: And the Court will. The Court  
6 feels the testimony by Officer or Deputy Squyres would  
7 be more probative than prejudicial. You will have a  
8 running objection throughout this.

9 MR. HINTON: Judge, just for the record,  
10 does the Court assume the way I do that Deputy Squyres,  
11 having testified before, will testify to things like  
12 tattoos and gang tattoos and gang affiliation.

13 THE COURT: Yes, sir.

14 MR. HINTON: And that's what the Court  
15 gives me a running objection to and the ruling is that  
16 the Court feels it's more probative than prejudicial.

17 THE COURT: Yes, sir. You may proceed.

18 Q. (By Ms. Buese) Deputy, could you explain the  
19 training and experience you have relating to gangs?

20 A. I've been involved directly in investigating  
21 gang members and gang related crime for the last 18  
22 years. I teach on a local and state level as far as  
23 identification of gang members, interviewing gang  
24 members, things along those lines. I've testified in  
25 court many times. And I've had, I don't know the exact

1 number, but over 500 hours worth of class time just  
2 specifically on gangs.

3 Q. And Deputy, in your training and experience,  
4 how do you determine if someone is a member of a  
5 criminal street gang?

6 A. Typically what we do is we do an interview,  
7 talk to the individual regarding gang related activity  
8 and things like that. We look at their tattoos. We  
9 check their social media sites. We talk to other people  
10 that know them. We do things like that.

11 Q. And is that part of your responsibility in your  
12 current assignment?

13 A. Yes, ma'am.

14 Q. And were you able to do at least some of those  
15 things and check some of those things in regards to this  
16 defendant?

17 A. Yes.

18 Q. Based on your training and experience, were you  
19 able to come to a conclusion whether or not the  
20 defendant was a member of any particular criminal street  
21 gang?

22 A. Yes, he was a member of the Houstones.

23 Q. What makes you say that?

24 MR. HINTON: Excuse me. I object under  
25 38.22. He was in custody and he was questioning him.

1 If that's what he's going to get into, I object to that.

2 THE COURT: What were the circumstances?

3 MS. BUESE: Judge, I believe he was about  
4 to testify regarding tattoos as well as prior arrest  
5 history with known gang members.

6 THE COURT: Specifically.

7 MR. HINTON: My objection would go to any  
8 conversation.

9 THE COURT: Okay.

10 MS. BUESE: I can clarify that.

11 THE COURT: And you may.

12 Q. (By Ms. Buese) Deputy, without getting into  
13 anything the defendant may or may not have told you, how  
14 were you able to make that determination?

15 A. Originally I made the determination by doing a  
16 query within the gang tracker database.

17 Q. What is that database?

18 A. The gang tracker database is a database that is  
19 owned by the Houston Police Department that the  
20 surrounding police groups have access to that we place  
21 people who are members of gangs in that database.

22 MR. HINTON: I would object if he's saying  
23 he made the determination based on hearsay in the  
24 database. I would object under 801 and 802.

25 MS. BUESE: Judge, I think we are going to

1 clarify that he made his own independent investigation.

2 THE COURT: Please do that right now.

3 Q. (By Ms. Buese) Deputy, did you just rely on  
4 some other officer at some point putting him into a  
5 computer system to determine that he was a member of a  
6 street gang?

7 A. No.

8 Q. What else did you look at?

9 MR. HINTON: If I could renew my  
10 objection, if he relied on it at all.

11 THE COURT: You are here to tell the jury  
12 exactly what you observed and any conclusions you  
13 observed from Mr. Bravo and no one else and from no  
14 other information. You may proceed. Let's proceed.

15 Q. (By Ms. Buese) Let's start talking about the  
16 defendant's tattoos. Does the defendant have any  
17 tattoos?

18 A. He does.

19 Q. Were you able to examine those tattoos?

20 A. I did.

21 Q. And what role, if any, does tattoos play in  
22 identifying gang members?

23 A. They are one of the criteria that the State  
24 sets out that we can use to identify a person as a gang  
25 member.

1 Q. What type of tattoos are associated with  
2 Houstones and Tango Blast?

3 A. Tattoos of the logos of our different sports  
4 teams in the area, contain the word Houstones pleural,  
5 Tango Blast, things along those lines.

6 MS. BUESE: May I approach the witness?

7 THE COURT: You may.

8 Q. (By Ms. Buese) I'm going to show you these  
9 exhibits that are marked as State's Exhibit 82 through  
10 93. Do you know who took these photographs?

11 A. I do.

12 Q. Who took them?

13 A. I did.

14 Q. And when did you take them?

15 A. On February 24th.

16 Q. And why did you take those photographs?

17 A. I took the photographs as part of the interview  
18 that we do on somebody to determine if they are a gang  
19 member.

20 Q. And why are you photographing the tattoos  
21 specifically?

22 A. To have documented that we actually looked at  
23 all the tattoos and take the tattoos that we see that  
24 are relevant and use those as part of our identification  
25 process.

1 Q. And State's Exhibit Nos. 82 through 93 are the  
2 photographs you took and do they fairly and accurately  
3 depict the defendant and his tattoos?

4 A. They do.

5 Q. And while we are at it, we referred to the  
6 defendant, could you do me a favor for the record and  
7 point to him and identify him by an article of clothing  
8 if you could?

9 A. The young man sitting at the table in the cream  
10 colored tie.

11 MS. BUESE: May the record reflect the  
12 witness has identified the defendant?

13 THE COURT: And it will.

14 MS. BUESE: At this time, I tender to  
15 opposing counsel State's Exhibit 82 through 93 and offer  
16 them.

17 MR. HINTON: We object under the objection  
18 we previously made.

19 THE COURT: Objection will be overruled.  
20 82 through 93 are also admitted for the jury's  
21 consideration. You may proceed.

22 MS. BUESE: Permission to publish. Casey,  
23 he was going to actually look at them if you don't mind,  
24 Your Honor.

25 THE COURT: You may.

1 MS. GARRETT: Thank you, Your Honor.

2 Q. (By Ms. Buese) Well, I guess one out of three  
3 will have to do. Let's start with State's Exhibit No.  
4 82. What, if any, tattoos are significant that you see  
5 in this photograph?

6 A. It's the left forearm of the defendant that has  
7 the word Texas.

8 Q. Why is that significant to you?

9 A. Houstones is part of what we call the Tango.  
10 They are a geographically based gang.

11 Q. And looking at State's Exhibit No. 83, what do  
12 we see in this photograph?

13 A. That would be the right forearm and it says  
14 Houston.

15 Q. And would that be significant for the same  
16 reason as State's Exhibit No. 82?

17 A. Yes.

18 Q. How about State's Exhibit No. 84?

19 A. 84 is the top of the right hand and it's the  
20 area code 713, which is a common identifier used by  
21 Houstones gang members.

22 Q. Did the defendant have some other tattoos that  
23 may not have been associated specifically with Tango  
24 Blast?

25 A. Yes, ma'am.

1 Q. Are they still tattoos that you see common to  
2 different gang members, and I guess to help you  
3 reference that, let's look at State's Exhibit No. 85?

4 A. Yes. That's a very common simple number that  
5 we see.

6 Q. What is that number for the record?

7 A. The number is 13.

8 Q. And in your training and experience, what is  
9 the significance of 13?

10 A. Typically if somebody is wearing 13, it means  
11 they are claiming they are showing a leg generally to  
12 the Mexican, the Serranos, which it's a southern thing,  
13 and 13 is used because M is the 13th letter of the  
14 alphabet, so the M for Mexican Mafia.

15 Q. Is it uncommon to find someone with tattoos  
16 referencing Mexican Mafia and Tango Blast?

17 A. No.

18 Q. How about State's Exhibit No. 86. What do we  
19 see here?

20 A. That's the left cheek of the defendant and  
21 that's the letter C and V.

22 Q. And do you know what that stands for?

23 A. Channelview.

24 Q. How about State's Exhibit No. 87? Any tattoos  
25 of interest here?

1 A. As far as gangs, no.

2 Q. So the tattoo on the defendant's neck, what is  
3 that a tattoo of?

4 A. It appears to be an old English A and B. I  
5 would assume his initials.

6 Q. So you didn't assign any particular gang  
7 significance to that tattoo?

8 A. No.

9 Q. State's Exhibit No. 88?

10 A. Just dollar signs.

11 Q. How does a dollar symbol figure in with gang  
12 tattoos?

13 A. Typically it represents you're chasing money,  
14 you're making money, that sort of thing.

15 Q. How about the other side of his neck State's  
16 Exhibit No. 89?

17 A. That would mean money over, that's the sign for  
18 a female, but they would use another term.

19 Q. Is that a term that you're familiar with in  
20 gang culture?

21 A. It's used a lot of times by lots of different  
22 gangs.

23 Q. If you could please use the words that a gang  
24 member would use for that tattoo?

25 A. Typically stands for money over bitches.

1 Q. State's Exhibit No. 90, what do we see here?

2 A. That's another dollar sign and kind of a face  
3 above it.

4 Q. Any specific gang reference here?

5 A. No, ma'am.

6 Q. How about State's Exhibit No. 91?

7 A. That's the word east.

8 Q. Any significance to that based on your training  
9 and experience?

10 A. Not specifically to gangs, no.

11 Q. Do gangs ever associate themselves with  
12 particular neighborhood or parts of town?

13 A. Yes, most definitely.

14 Q. Is that common or uncommon?

15 A. Very common.

16 Q. So when you see a tattoo like the one in  
17 State's Exhibit No. 91, how does that play into making a  
18 determination whether or not somebody is a gang member?

19 A. Well, it just depends on what it's paired up  
20 with. If it's east side, that's somebody from the east  
21 side. If it's east side CRIPP, then we know it's a  
22 CRIPP from the east side.

23 Q. And I guess I should put it back up. State's  
24 Exhibit No. 90 by itself, would that indicate gang  
25 membership?

1 A. No, ma'am.

2 Q. What if we defined it with State's Exhibit No.  
3 92 and all his other tattoos?

4 A. Tattoos as a whole, he has several that are  
5 used by Houstones gang members. So that helps me  
6 determine that.

7 Q. And what specific tattoo are we looking at in  
8 State's Exhibit No. 92, what does that help you  
9 determine?

10 A. That's on the web of the left hand. It's also  
11 281, which is an area code for Houston.

12 Q. And State's Exhibit No. 93?

13 A. The outline of the State of Texas with what  
14 appears to be a clown type face with some dollar signs  
15 for pupils.

16 Q. And based on your training and experience, what  
17 significance does this have to gang culture?

18 A. Nothing specific, just shows that the person is  
19 from Texas.

20 Q. Is it consistent with someone being a member of  
21 the Houstones?

22 A. I can see that tied to that, yes.

23 MR. HINTON: I object if he's speculating.  
24 He said he didn't see it.

25 THE COURT: That will be overruled. Wait

1 one second. Exactly what you said, did you tie this in  
2 to the Houstones or not?

3 THE WITNESS: Not as a specific Houstones  
4 tattoo. I wouldn't say it's a Houstones tattoo.

5 THE COURT: Okay. Thank you.

6 Q. (By Ms. Buese) Again, combining that tattoo  
7 with the defendant's other tattoos, what did you learn  
8 about the defendant?

9 A. In my opinion he has Houstones related tattoos.

10 Q. Were you able to review the records of the  
11 Harris County jail to determine when the defendant had  
12 ever been arrested along with other known gang members?

13 A. Yes, ma'am.

14 MR. HINTON: I object if that is going to  
15 be based on hearsay.

16 THE COURT: That will be sustained.

17 MR. HINTON: And Crawford violation.

18 MS. BUESE: Pass the witness.

19 THE COURT: Mr. Hinton.

20 CROSS EXAMINATION

21 BY MR. HINTON:

22 Q. Deputy, did the prosecutor ever ask you to look  
23 at any tattoos on a Steven Rangel?

24 MS. BUESE: I object to relevance.

25 THE COURT: Relevance.

1 MR. HINTON: Same relevance as they are  
2 offering it for.

3 MS. BUESE: Except Steven Rangel is not on  
4 trial.

5 THE COURT: Okay. That will be sustained.

6 MR. HINTON: I have nothing further.

7 THE COURT: Ms. Buese.

8 MS. BUESE: Nothing further from this  
9 witness. May he be excused?

10 THE COURT: Thank you, Deputy. You are  
11 excused. State, next witness.

12 MS. BUESE: State calls Laura Stone.

13 THE COURT: Laura, please raise your right  
14 hand to be sworn in.

15 (Witness sworn.)

16 THE COURT: Please have a seat.  
17 Ms. Buese, you may proceed.

18 MS. BUESE: Thank you, Judge.

19 LAURA STONE

20 Having first been duly sworn, testified as follows:

21 DIRECT EXAMINATION

22 BY MS. BUESE:

23 Q. Laura, could you please introduce yourself to  
24 the jury?

25 A. I'm Laura Stone.