

1 Q. All right. So, let's go back to when you were
2 actually employed at the Houston Police Department
3 June 3rd of 2011?

4 A. Yes.

5 Q. Did you catch a case that day involving a
6 four-year-old child by the name of Betsabeth Sandoval?

7 A. Yes, I did.

8 Q. And where were you when you were assigned that
9 case?

10 A. I was in the homicide office probably working
11 another case when I was assigned to go out there.

12 Q. And where did you go?

13 A. We were told that this scene was at 5801 West
14 Sunforest, Apartment 3011, but we were also aware that
15 the child was transported to Northwest Memorial
16 Hospital, so my partner, Sergeant Tom Hanslik, went to
17 the scene and I went to the hospital.

18 Q. When you got to the hospital, what did you
19 encounter?

20 A. Medical employees, EMTs, doctors, nurses, the
21 crime scene unit officer, patrol officers that were
22 protecting the scene which would have been in Trauma
23 Room 19, which is where I found the four-year-old baby
24 or child.

25 Q. Who did you talk to when you got there first?

1 A. First, it would have been the patrol officer
2 whoever it was. I'm sorry, I don't have the name of
3 that patrol officer, but it would have been the patrol
4 who introduced me to what they had, the child in the
5 trauma room and led me to the hospital officials to get
6 chart numbers and doctors' names and things of that
7 nature.

8 Q. And so did you speak to medical personnel?

9 A. Yes.

10 Q. By the time you got there, had Abigail, I'm
11 sorry, Betsabeth Sandoval, been pronounced deceased at
12 that point?

13 A. Yes.

14 Q. So, did you speak to medical personnel and get
15 sort of an idea of what her injuries were at that point?

16 A. They advised me of what they saw and then led
17 me to the room, and then I actually made the observation
18 of the child.

19 Q. And were you able to obtain some photographs of
20 the child that day of her condition, of her body?

21 A. Photographs were taken in my presence that day.

22 Q. Were the photographs available for your use
23 that particular day?

24 A. No.

25 Q. Okay. Were you able to view Betsabeth's body,

1 I'm sure, at the hospital?

2 A. Yes.

3 MS. SPENCE: Your Honor, may I approach?

4 THE COURT: You may.

5 Q. (BY MS. SPENCE) Let me show you what has been
6 marked as State's Exhibit No. 218. Do you recognize
7 that photograph?

8 A. Yes, I do.

9 Q. And does that photograph fairly and accurately
10 show Betsabeth at the hospital?

11 A. Yes.

12 MS. SPENCE: I offer into evidence State's
13 Exhibit No. 218.

14 (State's Exhibit No. 218 offered.)

15 MR. GONZALEZ: No objections, Your Honor.

16 THE COURT: State's Exhibit No. 218 is
17 admitted without objection.

18 (State's Exhibit No. 218 admitted.)

19 Q. (BY MS. SPENCE) When you saw Betsabeth
20 Sandoval's body, did you actually look at it from all
21 angles? Obviously, you didn't touch her, but just
22 looking at the various parts of her body?

23 A. Yes, I did.

24 Q. So, after you did that, who did you speak with?

25 A. I introduced myself to the mother, Maciel

1 Sandoval.

2 Q. And had you ever met her before that day?

3 A. Never.

4 Q. When you talked to her, what did you ask her to
5 do?

6 A. Well, initially I'm going to introduce myself
7 as a Houston police officer and that I'm investigating
8 because I know that the hospital personnel are going to
9 advise her that police are coming and they're going to
10 hear that it's a homicide investigator coming. So, you
11 want to put them a little at ease. So, I introduced
12 myself telling her I would be back to talk to her, and
13 also the fact that we're going to want to go to the
14 house and I'm going to need your consent to go into the
15 house and conduct our investigation.

16 So, I introduced myself, gave her the form,
17 instructed her on what the consent was going to be; and
18 then I returned back to the room where I made my
19 observations of the child. And then eventually when
20 that's completed, I came back; and I interviewed her.

21 Q. Okay. Now, after you received that consent to
22 search, did you call somebody and advise them that you
23 had obtained that consent to search?

24 A. Yes.

25 Q. Who was that?

1 A. My partner, Sergeant Tom Hanslik.

2 Q. That's for legal reasons so the scene can be
3 processed, correct?

4 A. Correct.

5 Q. So, after you did that, did you -- you said you
6 went and talked to Maciel Sandoval, correct?

7 A. Went back to the body, examined, saw the
8 injuries and then returned to Maciel; and I did a
9 audiotape, digital audio regarding of Maciel.

10 Q. Where was that done?

11 A. In what they call the family grieving room
12 outside the presence of the body in the trauma room
13 around the corner.

14 Q. So at that point, in your mind, what did you
15 know about this case? You're not even at the scene yet,
16 correct?

17 A. That's correct.

18 Q. So, what do you know when you're about to go
19 into a room with Maciel Sandoval?

20 A. Actually, I know nothing other than the fact
21 that I know there's the parties back at Apartment 3011,
22 that an ambulance was called to the house, this is the
23 mother, and now I have a child with all these injuries
24 from head to toe. And then -- go ahead.

25 Q. When you said you knew there were parties at

1 the scene, did you know the relationship of the parties
2 to Maciel Sandoval?

3 A. No.

4 Q. So, would it be fair to say that your knowledge
5 of what was going on was extremely limited when you went
6 to speak with her?

7 A. I knew nothing about the relationship, the
8 dynamics of the relationship, who watches who, time
9 periods, people were there, gone, I knew nothing.

10 Q. Those injuries that you saw on Betsabeth
11 Sandoval, to you, to your homicide eye from 30 years at
12 that point in time, did they appear to be accidental in
13 nature?

14 A. They were quite extensive and not by accident.
15 I'm a grandfather. I got a three year old. I know how
16 they run around.

17 Q. So, what time did your -- approximately what
18 time did your interview with Maciel Sandoval begin?

19 A. I believe 2:55 is when it started. Initially,
20 2:45 when I kind of introduced myself and gave her the
21 consent form, but the actual audio recording began about
22 2:55 ending at 3:42.

23 Q. 3:42. Did you document that, and that's how
24 you know?

25 A. Yes, yes.

1 Q. And this was just audio only, correct?

2 A. That's correct.

3 Q. During your conversation with Ms. Sandoval,
4 what was her demeanor that you were observing? She had
5 just lost a child, not lost a child but the child had
6 just passed away that day. What was the demeanor that
7 you were observing?

8 A. There were periods in that 50 minutes that I
9 was with her where she would cry, and she would make
10 comments regarding what happened to my baby. And I know
11 I can't explain details of the conversation, so I won't
12 go there. But to characterize her, I felt initially
13 that it was somewhat theatrical, her expressions and her
14 emotions. And then as I questioned her, I felt that she
15 was quite deceptive and was covering up things. And, in
16 fact, there's several times in there without going into
17 detail where she blatantly wouldn't answer a question
18 for some time. She would pause while she was thinking
19 about how she wanted to respond to those questions. So,
20 again, 20 years in homicide and hundreds of interviews,
21 I was picking up the fact that theatrical emotion and
22 quite deceptive in her responses.

23 Q. Was she reluctant to give you some information?

24 A. Specifically, when it came to family contacts,
25 people I could talk to, blank. Why do you need to know

1 that? Sorry. The only name that she provided -- and
2 may I mention what that name was?

3 Q. Yes.

4 A. The only name she would give me was her sister,
5 Sylvia, but she wouldn't tell me contact information,
6 phone number, where she lived. She did not mention
7 other folks that I know have testified because I found
8 them, the sisters, sorry.

9 Q. Now, after you finished your conversation with
10 Ms. Sandoval at about 3:42 that afternoon, did you have
11 any better or clearer idea of what happened to Betsabeth
12 Sandoval before you walked into that room?

13 A. No.

14 Q. Where did you go from the hospital?

15 A. I went to the scene, 5801 West Sunforest,
16 Apartment 3011.

17 Q. Why did you go over there?

18 A. Again, as an investigator, I like -- I know my
19 partner, Tom Hanslik, and the CSU that was documenting
20 everything was, you know, they'd do an outstanding job.
21 But for me to do effective job going forward as far as
22 interviewing, I wanted to get an eye on what was going
23 on at the scene. So, I went to the scene just so I
24 could visualize what I was getting into.

25 Q. And when you went out to the scene, did

1 Sergeant Hanslik point out a broken, what looked like a
2 broomstick handle?

3 A. Yes, he did.

4 Q. Did you know about that broomstick handle or
5 that broken piece of wood when you were talking to
6 Maciel Sandoval in the hospital?

7 A. No.

8 Q. Did he also point out some letters, and it
9 looked like hearts and teddy bears and that sort of
10 thing?

11 A. Signs of affection posted on the wall, yes.

12 Q. Did you know anything about that when up you
13 were talking to Ms. Sandoval?

14 A. In fact, just the opposite.

15 Q. Did she, in any way, indicate any type of
16 romantic relationship with Elida Herrera at that time
17 that you talked to her at the hospital?

18 A. At that time just a friend.

19 Q. So, after you left the scene, did you go to --
20 back to the homicide division?

21 A. Yes.

22 Q. While you're out at the scene, do you learn the
23 name Angel Hernandez?

24 A. Yes, I do.

25 Q. Were you able to speak to him that particular

1 day?

2 A. No.

3 Q. When you went back, when you went to the
4 homicide division that same day on June 3rd of 2011, who
5 was there?

6 A. The Defendant, Judith, well, they referred to
7 her as Judith, but I guess her name is Elida Judith
8 Herrera-Garcia, she had been transported from the scene
9 to homicide because of the Spanish language barrier, and
10 we had the Spanish speakers interviewing her.

11 Q. What about Maciel, was she at the homicide
12 division as well?

13 A. Maciel had also been transported from the
14 hospital to the homicide division.

15 Q. Did you speak with Maciel, again, when you went
16 to the homicide division?

17 A. Yes, I did.

18 Q. Very briefly?

19 A. Briefly.

20 Q. And what sorts of things did you point out to
21 her that you didn't know before?

22 A. The discrepancies in her earlier comments
23 regarding her relationship with Judith and what I found
24 at the apartment as far as sleeping arrangements, beds,
25 love notes, broomstick, the pillow, Valentine-type

1 pillow up on the wall.

2 Q. Was she anymore forthcoming with you at that
3 point in time, June 3rd?

4 A. Yes, yes.

5 Q. Did you speak to her about the stick?

6 A. Yes.

7 Q. Was she forthcoming as to any type of
8 explanation of why the stick would be right there in the
9 middle of the bed in the master bedroom?

10 A. Evasive and comments that made absolutely, they
11 were ludicrous, their comments.

12 Q. After that particular day, what else did you do
13 with regards to this investigation?

14 A. On that particular day, June 3rd?

15 Q. June 4th. The next day.

16 A. Oh, the following day?

17 Q. Yes.

18 A. Okay. June 4th, we attended the autopsy. We
19 also went to AutoZone where Maciel Sandoval was employed
20 to get her work records and employment records and times
21 that she was at work, and then also made additional
22 attempts to try and find this Angel Hernandez fella in
23 Apartment 1903.

24 Q. No luck that day?

25 A. No luck that day, either.

1 Q. So, let's go to Sunday, June 5th, 2011, on that
2 day did Angel make contact with you?

3 A. Yes. In my visits to his apartment, I finally
4 found a car that was supposed to be his, I left a note.
5 And he was calling me Sunday evening, it was after I
6 left work, but he was already calling, pleading that I
7 make contact with him.

8 Q. And did you eventually interview Angel
9 Hernandez and his wife, common-law wife, Juana Sandoval?

10 A. The following morning, yes.

11 Q. Describe their level of cooperativeness in this
12 case?

13 A. Most folks are reluctant, you got to make
14 several phone calls to get them. When I called Angel,
15 he was at work; and you could tell by the excitement in
16 his voice he wanted to express things that he had seen
17 in that apartment. And when I asked him where can I
18 meet you, you're obviously at work, he said, I'll meet
19 you back at the apartment right now. I could hear him
20 on the phone talking to his boss. He left work and we
21 went to Apartment 1903.

22 When I arrived is when I was introduced to
23 Juana. And they were at the apartment very enthusiastic
24 to provide information that they had seen that they
25 had -- you could tell that they held for so long, and

1 they were just thrilled to finally provide that
2 information to somebody.

3 Q. Did you see emotion in Angel and Juana during
4 your conversation with them?

5 A. Animated emotional, Juana cried, she wept. It
6 was a spontaneous weeping, when you're talking to
7 somebody and they're visualizing something and so the
8 tears are coming. And then you make the comment that
9 this is disturbing to you, and they would acknowledge
10 that and then they'd carry on with the details of things
11 that they saw.

12 Q. Did she introduce you to another sibling of
13 Maciel Sandoval?

14 A. Yes.

15 Q. And who was that?

16 A. It was Gloria Sandoval.

17 Q. Was she at that same location or another
18 location?

19 A. She was at another house. They had to lead me
20 to another location.

21 Q. And at that location, did you interview Gloria
22 Sandoval?

23 A. Recorded, audio recorded.

24 Q. And what was her demeanor, did she appear to be
25 emotional as well?

1 A. Yes, truthful, emotional about the whole thing.

2 Q. Now at that point, were you getting kind of a
3 better picture of what the dynamics were in Betsabeth's
4 immediate household?

5 A. Yes.

6 Q. At the autopsy, had you also spoken to some CPS
7 representatives?

8 A. Yes.

9 Q. And based upon those conversations, did y'all
10 obtain some CPS records?

11 A. Yes.

12 Q. Did you review those records?

13 A. Yes.

14 Q. Okay. And based upon the CPS records and what
15 you were told by the CPS people, did y'all also obtain
16 some phone records of Elida Herrera's phone and Maciel
17 Sandoval's cell phone?

18 A. The official record later on, but in our
19 meeting with CPS, we had learned that some phone calls
20 had been made that we thought were interesting.

21 Q. Let's look at, let's specifically go to June
22 3rd. You had told us that you started your interview at
23 2:55, and you ended it at 3:42; is that correct?

24 A. Correct.

25 Q. And you made notes of that in your note taking;

1 is that correct?

2 A. Offense report, yes.

3 Q. What did you notice when you finally got the
4 records of Maciel Sandoval's phone contacts as to who
5 she called very, very shortly after you finished your
6 conversation with her?

7 A. Within minutes of my conversation, she was
8 reaching out to Brian Victorian, who was a CPS case
9 agent.

10 Q. At that point in time, had a CPS complaint been
11 made against -- on behalf of Betsabeth Sandoval?

12 A. Yes.

13 Q. And I'm talking about when the child passed
14 away, June 3rd, there was an outstanding CPS complaint;
15 is that correct?

16 A. Prior to all that there was an ongoing
17 investigation.

18 Q. And as of that day, Maciel Sandoval was not
19 aware of its closure yet?

20 A. That is correct.

21 Q. And she told you that in a later interview?

22 A. Yes.

23 Q. All right. So that -- after kind of getting a
24 better picture from talking to Juana, Gloria, Angel, the
25 CPS people, what did you and Sergeant Hanslik decide to

1 do in terms of trying to get answers from Elida Herrera
2 and Maciel Sandoval themselves?

3 A. We scheduled another interview.

4 Q. And how did you do that? Did you just call
5 them up?

6 A. I simply called them up, and we had the
7 information. We kept our conversations non-accusatory,
8 kept that rapport going with them. And so on the 7th of
9 June, that would have been following all the interviews,
10 autopsy, CPS, I reached out to Maciel and asked if she
11 could come back into the office on her own.

12 Q. And did she agree to do so?

13 A. She came in with her stepmother on her own in
14 her own vehicle.

15 Q. And did Elida Herrera come with her as well?

16 A. Yes.

17 Q. And that would be on what?

18 A. June 7th.

19 Q. Which is the next Tuesday?

20 A. Scene happened on Friday, we worked on it
21 Saturday, Sunday. Monday I spoke to all the family
22 members. Tuesday she was in the office.

23 Q. Now, by that time had the pictures been
24 developed that had been taken by the CSU at the
25 hospital?

1 A. Yes.

2 Q. And did you have access to those photographs?

3 A. Yes.

4 Q. And by that time did you also have access to
5 other photographs that were given to you by family
6 members?

7 A. Correct.

8 Q. Do you know if you can recall was that -- by
9 that time had Horacio Ramos, who is Betsabeth's
10 biological father, he had already been spoken to; is
11 that correct?

12 A. Sergeant Tom Hanslik spoke to him while I was
13 speaking with the family members.

14 Q. And you had photographs that he provided as
15 well?

16 A. That's correct.

17 Q. So, did you use some of those photographs that
18 you got from the hospital and from family members and
19 Horacio Ramos on that day, on June 7th, when you spoke
20 to Maciel and Elida in person?

21 A. When I spoke with Maciel, I did not speak to
22 Elida.

23 Q. Who did you have speak to Elida?

24 A. Sergeant Padilla.

25 Q. And did you also make available to him the same

1 photographs that you used when you spoke to Maciel?

2 A. Yes.

3 Q. And were they interviewed in the same room
4 together, anything like that?

5 A. Separated.

6 Q. As a matter of fact, you interviewed Maciel
7 first, and then Sergeant Padilla interviewed Elida; is
8 that correct?

9 A. That's correct.

10 MS. SPENCE: Now, may I approach?

11 THE COURT: You may.

12 Q. (BY MS. SPENCE) Let me show you photographs
13 that have already been entered into evidence, which is
14 State's Exhibits No. 89, and then these other
15 photographs, which is 94, 90. I'm going to put these in
16 order, 91, 92, 93, 96 -- 95, 96, 97, 100, 102, 103, 104
17 and 105. Are those photographs that you showed to
18 Maciel Sandoval and during your interview with her the
19 second time on June 7th?

20 A. That is correct.

21 THE COURT: So that the record is clear, I
22 already made a note on the record that 91 and 95 were
23 previously admitted. I don't show that State's Exhibit
24 No. 105 has been admitted.

25 MS. SPENCE: At this time I offer into

1 evidence State's Exhibit No. 105.

2 (State's Exhibit No. 105 offered.)

3 MR. GONZALEZ: No objection.

4 THE COURT: State's Exhibit No. 105 is
5 admitted without objection.

6 (State's Exhibit No. 105 admitted.)

7 Q. (BY MS. SPENCE) Now, when you talked to Maciel
8 Sandoval, was that a video and audio-recorded statement?

9 A. Yes, it is.

10 Q. How is it that you showed her these
11 photographs? Did you spread them out on the table in
12 front of her? Did you show them to her one by one or
13 what?

14 A. We began with going over material that we had
15 discussed earlier, and when it came to finally bringing
16 the conversation to the injuries, I then presented each
17 injury to the mother singular, each photo, explain this
18 particular injury to your child here. And then we went
19 over each one, and obviously what I was trying to attain
20 was what was going on in that house to this little girl.

21 Q. Without going into detail, did she give you any
22 explanation of how this child got these injuries other
23 than what -- did she give you any indication of how this
24 child got these injuries?

25 A. Her words throughout the conversation were

1 basically --

2 MR. GONZALEZ: Objection as to hearsay,
3 Your Honor.

4 THE COURT: Sustained.

5 Q. (BY MS. SPENCE) Did she claim any
6 responsibility for the injuries?

7 A. None.

8 Q. Did she point the finger at Elida Herrera and
9 say that she caused any of the injuries?

10 A. She did not.

11 Q. As a matter of fact, she absolutely denied that
12 she could have committed these injuries, correct?

13 A. That's correct.

14 Q. I'm going to show you what's been marked as
15 State's Exhibit No. 89 that has already been admitted
16 into evidence. There are some markings right to the
17 side of it that I'm kind of pointing out. Where did
18 those markings come from?

19 A. Maciel Sandoval.

20 Q. Was that done during the interview?

21 A. It was done during the interview of June 7th.

22 Q. And what had you asked her to do?

23 A. It was based on some of her responses to my
24 questions, and --

25 Q. What did you ask her to do?

1 A. I asked her to describe your child because I'm
2 looking at a very happy, smiley baby here.

3 Q. This photograph, right?

4 A. Yes, that photograph and I put it on the
5 camera; and I showed it to her. I said, look at this
6 beautiful, happy, little child; and her comments were
7 not consistent with that kind of description. So I left
8 her with that picture for a few minutes, and I said,
9 well, why don't you show me what kind of child she was
10 because this picture of this beautiful, happy baby is
11 not the baby that you obviously were raising? You
12 characterize her. And then I walked out and left her
13 with a pen and told her do your best artist rendition of
14 that child.

15 Q. And you had just been to the autopsy a few days
16 before, correct?

17 A. Yes.

18 Q. And is this the result of what she came up
19 with?

20 A. Yes, that's her writing. I didn't add
21 anything.

22 Q. So, what we have up here is kind of a smiley
23 face and the word "sometimes"?

24 A. Yes.

25 Q. And then we have the words, "most of times,"

1 and there's kind of a weird, sort of, mouth here. What
2 is that supposed to signify?

3 A. Well, it appears as if --

4 MR. GONZALEZ: Objection, calls for
5 speculation, Your Honor.

6 THE COURT: Sustained.

7 Q. (BY MS. SPENCE) Well, is that supposed to be a
8 smiley face per Maciel or teeth or what?

9 MR. GONZALEZ: Objection, it calls for
10 speculation, Your Honor.

11 MS. SPENCE: Per Maciel.

12 THE COURT: That objection is overruled.

13 A. She was describing her child as sad and then
14 angry. And so that's where you see the word, maybe sad,
15 I'm not sure if that's what she was trying to write, but
16 she scratches out S-A --

17 MR. GONZALEZ: Objection, calls for
18 speculation, Your Honor.

19 THE COURT: Overruled.

20 A. And then immediately following that is the word
21 "mad," which is clearly printed there, mad.

22 Q. So, right under here it starts with S-A,
23 correct?

24 A. I would agree with that.

25 Q. And then mad, all right. That was from her

1 mama?

2 A. Yes, Maciel Sandoval.

3 Q. If we believed what Maciel told you on the two
4 days that you interviewed with her, basically, the child
5 self-inflicted her injuries; is that right?

6 A. Yes.

7 MS. SPENCE: Pass the witness.

8 THE COURT: All right. Thank you, Ms.
9 Spence.

10 Mr. Gonzalez.

11 MR. GONZALEZ: Enjoy your retirement.
12 Thank you for coming.

13 THE WITNESS: That's so surprising. Thank
14 you.

15 THE COURT: Thank you, Mr. Gonzalez. May
16 Officer Swainson be excused?

17 MS. SPENCE: No objection.

18 MR. GONZALEZ: No objection.

19 THE COURT: All right. You are excused.
20 Call your next witness, please.

21 MS. THOMAS: Judge, the next witness is the
22 medical examiner. I don't know if he's made it here
23 yet. He's supposed to be on the way.

24 MS. SPENCE: Your Honor, at this time, I
25 would offer into evidence State's Exhibit No. 204, the

1 contents of 204 and 206.

2 (State's Exhibit Nos. 204 and 206 offered.)

3 MR. GONZALEZ: No objection.

4 THE COURT: State's Exhibits 204 and 206
5 are admitted without objection.

6 (State's Exhibit Nos. 204 and 206
7 admitted.)

8 MS. THOMAS: He's en route.

9 THE COURT: Will the attorneys approach,
10 please?

11 (Bench conference.)

12 THE COURT: Do you have any other
13 witnesses?

14 MS. THOMAS: I think that's it.

15 THE COURT: Last witness?

16 MS. SPENCE: Well, he may be the medical
17 examiner, Dr. Love; but they're in the same car. We
18 didn't expect it to go this fast. We told them to be
19 here at, like, 11:30, we told them.

20 THE COURT: All right.

21 MR. GONZALEZ: You want to break for lunch?

22 THE COURT: No, I don't think so. We'll
23 wait.

24 MR. GONZALEZ: All right.

25 (End of bench conference.)

1 THE COURT: Ladies and gentlemen, if you'll
2 step back to the jury room for a few minutes, we'll
3 resume testimony shortly.

4 THE BAILIFF: Rise for the jury.

5 (Jury exits courtroom.)

6 THE COURT: Be seated, please.

7 (Open court, Defendant present.)

8 THE BAILIFF: Ready, Judge?

9 THE COURT: Yes, bring in the jury.

10 THE BAILIFF: Rise for the jury.

11 (Jury enters courtroom.)

12 THE COURT: Be seated, please.

13 For the record, will you call your next
14 witness?

15 MS. THOMAS: Yes, ma'am, the State calls
16 Dr. Joseph Chu -- Albert Chu, sorry.

17 THE COURT: Doctor, if you will raise your
18 right hand to be sworn.

19 (Witness sworn.)

20 THE COURT: You may be seated.

21 Ms. Thomas, you may proceed.
22
23
24
25

1 **ALBERT CHU,**
2 having been first duly sworn, testified as follows:

3 **DIRECT EXAMINATION**

4 BY MS. THOMAS:

5 Q. Sir, will you, please, introduce yourself to
6 the jury?

7 A. My name is Albert Chu. I'm the assistant
8 medical examiner at the Harris County Institute of
9 Forensic Sciences.

10 Q. And how long have you worked there?

11 A. Since 2005.

12 Q. Tell us what you do in your line of work?

13 A. My job is to investigate any sudden, unexpected
14 or violent deaths that occur within Harris County.

15 Q. Can you give us the benefit of your educational
16 background, training for the job that you do?

17 A. I went to college at Johns Hopkins University
18 in Baltimore, Maryland. I also got a Master's degree
19 from that same institution. I went to medical school at
20 State University of New York in Buffalo, New York. I
21 then did a residency training program in anatomic and
22 clinical pathology at The Hospital at the University of
23 Pennsylvania in Philadelphia, Pennsylvania. I then did
24 a fellowship in forensic pathology at the office of the
25 chief medical examiner for the State of Maryland in