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COMMONWEALTH OF MASSACHUSETTS  
CLERK OF THE COURTS  
NORFOLK COUNTY  
SUPERIOR COURT  
DOCKET NO: 2282CR0117

NORFOLK, SS.

COMMONWEALTH

V.

KAREN READ

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**COMMONWEALTH'S PRE-TRIAL MEMORANDUM**

**1. STATEMENT OF FACTS**

On the morning of January 29, 2022, at approximately 6:04 a.m., the Canton Police Department received a 911 call reporting an unresponsive male party in the snow outside a residence at 34 Fairview Road within their town. Officers responded and discovered the male party, subsequently identified as John O'Keefe off the roadway in the front lawn area. Officers identified three women with Mr. O'Keefe, one of whom was the defendant, Karen Read, the girlfriend of Mr. O'Keefe. The defendant had been with Mr. O'Keefe the previous evening at two different bars in Canton and had driven with him to this residence in the early morning hours of this date. Mr. O'Keefe was treated by paramedics from the Canton Fire Department and transported to the Good Samaritan Medical Center, where he was subsequently pronounced deceased. The Commonwealth alleges that the defendant struck Mr. O'Keefe with her vehicle, earlier that morning, and then left the scene, while Mr. O'Keefe lay injured in the snow during a blizzard.

The defendant denies that she has committed any crimes.

**2. STIPULATIONS**

None.

**3. PROPOSED EXHIBITS**

- a. Certified copy of death certificate of John O'Keefe
- b. Copy of MSPCL Serum/Plasma Conversion Report
- c. Copy of MSPCL Retrograde Extrapolation Report
- d. Copy of 911 calls
- e. Copy of Canton Police Department photos
- f. Copy of RING videos from One Meadows Avenue, Canton
- g. Copy of video surveillance from Waterfall Bar & Grille
- h. Copy of receipt from Waterfall Bar & Grille
- i. Copy of surveillance video from C.F. McCarthy's
- j. Copy of receipts from C.F. McCarthy's
- k. Copy of MSPCL CSSS photos
- l. Copy of MSP scene photos – SERT search
- m. Copy of surveillance video from Canton Town Library
- n. Copy of MSPCL CSSS vehicle diagram
- o. Copy of MSP SERT Unit diagram
- p. Copy of OCME autopsy photos
- q. Copy of Cellebrite extraction report of cell phone of Jennifer McCabe
- r. Copy of Cellebrite extraction report of cell phone of Kerry Roberts
- s. Copy of Cellebrite extraction report of cell phone of John O'Keefe
- t. Copy of Cellebrite extraction report of cell phone of Karen Read
- u. Copy of Cellebrite extraction report of cell phone of Jennifer McCabe from January 28-29, 2022
- v. Copy of Cellebrite extraction report of cell phone of Kerry Roberts from January 28-29, 2022
- w. Copy of Cellebrite extraction report of cell phone of John O'Keefe, phone calls to and from Karen Read from January 29, 2022

- x. Copy of Cellebrite extraction report of cell phone of John O'Keefe, voicemails from Karen Read on January 29, 2022
- y. Copy of MSP CARS Section vehicle testing video
- z. Certified copy of RMV documents for MA Reg. #: 3GC684
- aa. Copy of MSP CARS Section diagrams
- bb. Copy of OCME body and head diagrams
- cc. Copy of MSP CARS Section Bosch CDR download
- dd. Clothing, including hat and sneakers of John O'Keefe
- ee. Copy of cell phone extraction of communications of Brian Higgins
- ff. Copy of Verizon cell phone records of Karen Read
- gg. Copy of Verizon VoLTE records of cellSites diagrams for Karen Read's phone
- hh. Copy of Verizon RTT records diagrams for Karen Read's phone
- ii. Certified copy of medical records of John O'Keefe from Good Samaritan Medical Center
- jj. Certified copy of medical records of Karen Read from Good Samaritan Medical Center
- kk. Copy of Canton Police Department cruiser camera videos
- ll. Copy of MSP Body Worn Camera Footage, from June 9, 2022
- mm. Copy of Canton Police Department scene search video
- nn. Copy of diagram of John O'Keefe's GPS points
- oo. Copy of MSPCL photos of lab work
- pp. Copy of MSP CARS Section Toyota Techstream, ACM, and VCH data
- qq. Copy of Canton Police Department surveillance video
- rr. Copy of video from residence in Dighton
- ss. Taillight from Defendant's Vehicle
- tt. Taillight pieces recovered from scene
- uu. Cocktail glass recovered from scene
- vv. Victim's cellphone

4. **LEGNTH OF TRIAL**

Five to Six Weeks.

5. **COMMONWEALTH WITNESS LIST**

**Police Officers**

1. Trooper Michael Proctor  
Massachusetts State Police;
2. Sgt. Yuriy Bukhenik  
Massachusetts State Police;
3. Trooper Zachary Clark  
Massachusetts State Police;
4. Trooper Connor Keefe  
Massachusetts State Police;
5. Trooper David DiCicco  
Massachusetts State Police;
6. Trooper Christopher Moore  
Massachusetts State Police;
7. Trooper Matthew Dunne  
Massachusetts State Police;
8. Lt. Brian Tully  
Massachusetts State Police;
9. Trooper Nicholas Guarino  
Massachusetts State Police;
10. Trooper Joseph Paul  
Massachusetts State Police;
11. Officer Steven Saraf  
Canton Police Department;
12. Officer Stephen Mullaney  
Canton Police Department;

13. Sergeant Sean Goode  
Canton Police Department;
14. Sergeant Michael Lank  
Canton Police Department;
15. Lieutenant Paul Gallagher  
Canton Police Department;
16. Lieutenant Charles Ray  
Canton Police Department;
17. Lieutenant Kevin O'Hara  
Massachusetts State Police;
18. Officer Nicholas Barros  
Dighton Police Department;
19. Sergeant Brian Gallerani  
Needham Police Department;
20. Trooper Evan Brent  
Massachusetts State Police;
21. Trooper Everton DeCastro  
Massachusetts State Police;
22. Trooper Justin Pye  
Massachusetts State Police;
23. Captain Eric Benson  
Massachusetts State Police

**Civilian Witnesses**

24. Heather Maxon  
Plainville, MA;
25. Anthony Flematti  
Canton Fire Department;
26. Doctor Irini Scordi-Bello  
Office of the Chief Medical Examiner;
27. Doctor Renee Stonebridge  
Office of the Chief Medical Examiner;

28. Timothy Nuttall  
Canton Fire Department;
29. Francis Walsh  
Canton Fire Department;
30. Matthew Kelly  
Canton Fire Department;
31. Gregory Woodbury  
Canton Fire Department;
32. Katie McLaughlin  
Canton Fire Department;
33. Jason Becker  
Canton Fire Department;
34. Daniel Whitley  
Canton Fire Department;
35. Wendell Robery  
Canton Fire Department;
36. Jennifer McCabe  
Canton, MA;
37. Matthew McCabe  
Canton, MA;
38. Allison McCabe  
Canton, MA;
39. Kerry Roberts  
Canton, MA;
40. Curt Roberts  
Canton, MA;
41. Paul O'Keefe  
West Bridgewater, MA;
42. Erin O'Keefe  
West Bridgewater, MA;

43. Juvenile with initials K.F.  
Canton, MA;
44. Juvenile with initials P.F.  
Canton, MA;
45. Michael Camerano  
Canton, MA;
46. Katherine Camerano  
Canton, MA;
47. Brian Higgins  
Sandwich, MA;
48. Brian Albert  
Norwood, MA;
49. Nicole Albert  
Norwood, MA;
50. Brian Albert, Jr.  
Norwood, MA;
51. Ian Whiffin  
Alberta, Canada;
52. Doctor Justin Rice  
Good Samaritan Medical Center;
53. Daisy Ormseth, NP  
Good Samaritan Medical Center;
54. Kathleen Wilfert, RN  
Good Samaritan Medical Center;
55. Doctor Garrey Faller, Medical Director  
Good Samaritan Medical Center;
56. Teri Kun  
UC Davis Veterinary Lab;
57. Nicholas Bradford  
BODE Technology;

58. Tess Chart  
BODE Technology;
59. Julie Albert  
Canton, MA;
60. Christopher Albert  
Canton, MA;
61. Colin Albert  
Canton, MA;
62. Ryan Nagel  
Canton, MA;
63. Tristin Morris  
Easton, MA;
64. Caitlin Albert  
Easton, MA;
65. Gretchen Voss  
Boston, MA;
66. Louis Jutras  
Canton, MA;
67. Nicholas Roberts  
Massachusetts Office of Alcohol Testing;
68. Sara Levinson  
Canton, MA;
69. Andre Porto  
Massachusetts State Police Crime Lab;
70. Ashley Vaillier  
Massachusetts State Police Crime Lab;
71. Maureen Hartnett  
Massachusetts State Police Crime Lab;
72. Christina Hanley  
Massachusetts State Police Crime Lab;



73. Sophie Hryzan  
Massachusetts State Police Crime Lab;
74. Brian Loughran  
Canton, MA;
75. Richard D'Antuono  
Canton, MA;
76. Jean DeMulis  
Canton, MA;
77. James Sullivan  
Canton, MA;
78. Steven Bernstein  
Stoughton, MA;
79. Julianna Nagel  
Canton, MA;
80. Nicholas Kolokithas  
Canton, MA;
81. Michael Trotta  
Canton, MA;
82. Rebecca Trayers  
Canton, MA;
83. Brigid Meehan  
Canton, MA;
84. Jessica Hyde  
Bridgeport, NY;
85. Marietta Sullivan  
Pembroke, MA;
86. Karina Kolokithas  
Canton, MA;
87. Laura Sullivan  
Pembroke, MA;

6. **Defendant's Witness List.**

Respectfully Submitted,

*/s/ Adam C. Lally*

Adam C. Lally  
Assistant District Attorney  
Norfolk District Attorney's Office

*/s/ Laura H. McLaughlin*

Laura McLaughlin  
Assistant District Attorney  
Norfolk District Attorney's Office

Date: April 15, 2024

## **DEFENSE WITNESS LIST**

Ms. Read also reserves the right to call any of the witnesses included on the Commonwealth's witness list.

1. Brian Albert – Norwood, MA
2. Caitlin Albert – Easton, MA
3. Christopher Albert – Canton, MA
4. Colin Albert – Canton, MA
5. Julie Albert – Canton, MA
6. Kevin Albert – Canton, MA
7. Nicole Albert – Norwood, MA
8. Michael Wagner – Foxboro, MA
9. Sheryl Waugh – Canton, MA
10. Paul Mackowski – Melrose, MA
11. Leslie Bernstein – Canton, MA
12. Rebecca Baizen – Canton, MA
13. Officer Nicholas Barros – Dighton Police Department
14. Officer Paul Beaudoin – Dighton Police Department
15. Former Chief of Canton Police Department Kenneth Berkowitz
16. Trooper Evan Brent – Massachusetts State Police
17. Sgt. Yuri Bukhenik – Massachusetts State Police
18. Laurie Cahill – Worcester, MA
19. Trooper Zachary Clark – Massachusetts State Police
20. Christopher Curran – Canton, MA
21. Kerri Curran – Canton, MA
22. Nicholas Curran – West Roxbury, MA
23. Richard D'Antuono – Canton, MA
24. Officer Kelly Dever – Boston Police Department
25. Stephanie Devlin – Massachusetts State Police Crime Lab
26. Trooper David Diccico – Massachusetts State Police
27. Patrick Haggerty – Dighton, MA
28. Maureen Hartnett – Massachusetts State Police Crime Lab
29. Brian Albert, Jr. – Canton, MA
30. Brian Higgins – Sandwich, MA
31. Louis Jutrus – Canton, MA
32. Trooper Connor Keefe – Massachusetts State Police
33. Matthew Kelly – Canton Fire Department
34. Karina Kolokithas – Canton, MA
35. Nicholas Kolokithas – Canton, MA
36. Teri Kun – UC Davis Veterinary Lab

37. Sergeant Michael Lank – Canton Police Department
38. Brian Loughran – Canton, MA
39. Heather Maxon – Plainville, MA
40. Allison McCabe – Canton, MA
41. Jennifer McCabe – Canton, MA
42. Matthew McCabe – Canton, MA
43. Lance Mello – Massachusetts State Police Crime Lab
44. Ryan Nagel – Canton, MA
45. Steve Nelson – Norfolk County District Attorney's Office
46. Andre Porto – Massachusetts State Police Crime Lab
47. Hollie Price – Google, LLC
48. Trooper Kathleen Prince – Massachusetts State Police
49. Elizabeth Proctor – Canton, MA
50. Trooper Michael Proctor – Massachusetts State Police
51. Kerry Roberts – Canton, MA
52. Wendell Robery – Canton Fire Department
53. Steven Ridge – Boston Police Department
54. Heriberto Hernandez – Boston Police Department
55. Marc Lopilato – Canton, MA
56. Alfredo Lopilato – Canton, MA
57. Angela Malvone – Canton, MA
58. Lt. Brian Tully – Massachusetts State Police
59. Courtney Proctor – Canton, MA
60. Tristan Morris – Easton, MA
61. Jean DeMulis – Canton, MA
62. Mary Souza – Dighton, MA
63. Ashley Bell – Canton, MA
64. Mike Rushworth – Thompson Station, TN
65. Matthew Amory – Canton, MA
66. Norfolk County District Attorney Michael Morrissey – Norfolk County District Attorney's Office
67. Thomas Beatty – Canton, MA
68. Erin Beatty – Canton, MA
69. Meghan Mariani – New York, New York
70. Thomas Martin – Weymouth, MA
71. John O'Keefe, Sr. – Braintree, MA

**EXPERT WITNESSES**

72. Frank Sheridan, M.D. – Forensic Pathologist – San Bernadino, CA

73. Chris Van Ee, PhD. – Expert in Biomedical and Mechanical Engineering – Novi,  
MI

74. Richard Green – Expert in Digital Forensics – St. Petersburg, FL

75. Daniel Wolfe, Ph.D. – ARCCA, Inc. – Penns Park, PA

76. Andrew Rentschler, PhD. – ARCCA, Inc. – Penns Park, PA

77. Scott Kline, BSME – ARCCA, Inc. – Penns Park, PA