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COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.
DEPARTMENT

SUPERIOR

COURT

NO. 2182CR00320

COMMONWEALTH

V.

MYLES KING

COMMONWEALTH'S & DEFENDANT'S REQUEST FOR A CONTINUANCE AND
REDUCTION OF THE DEFENDANT'S BAIL

Now comes the parties who respectfully request that the court continue the September 9, 2025, trial date. As grounds therefore, the parties respond:

(1) On February 20, 2025, the Commonwealth filed its Notice of Discovery XXVIII which contained items #3 through 184 (Bates Stamp #s of 000023-000471).

(2) On April 16, 2025, the Commonwealth provided Notice of Discovery XXIX, which contained January 28, 2025, Norfolk Grand Jury Minutes relative to the return of Jail Calls of Myles King that were obtained under a Grand Jury subpoena in 2021.

(3) On May 15, 2025, the Commonwealth provided Notice of Discovery XXXI, which contained items #242 through 336 (Bates Stamp #001893-002026).

(4) On May 28, 2025, the defendant filed, "Defendant's Motion to Dismiss Or, in the Alternative, Release King on Bail and Continue the Trial Date Given the Voluminous Late Disclosed Evidence". A hearing on the

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CLERK OF COURT
NORFOLK COUNTY

Motion to Dismiss has not been scheduled. In the motion, the defense articulated its reasons for why he would be prejudiced if a continuance was not allowed in this matter. In the alternative, the defense has moved that evidence be excluded at trial for any evidence provided in Notices of Discovery XXVIII, XXIX and XXXI.

(5) Counsel for King is in the process of reviewing 6 search warrants and affidavits not previously provided, involving the following:

1. Requests for pinging;
2. Sting Ray;
3. Cell site simulator;
4. Range to tower activity;
5. Cell tower locations for phones;

Additionally, a sample of the late discovery includes:

1. Numerous police reports from July of 2021;
2. MSP Crime Lab reports,
3. BRIC reports of other suspects;
4. At least one witness who died before his name was ever turned over to King;
5. ATF trace summaries;
6. License plate reader information;
7. Preservation requests and information from Facebook, Snapchat, Twitter, and YouTube;
8. Photo arrays;

9. Tower dump records and analysis of tower dump records;
 10. Phone information charts;
 11. Police reports from Milton Police from July of 2021;
 12. Police reports from Quincy Police from July of 2021;
 13. T-Mobile CALEA
 14. T-Mobile Lawful intercept worksheets from 7/11/2021, 7/14/2021, 8/3/2021;
 15. Bode DNA case report;
 16. 911 radio transmissions;
 17. August 2019 social media posts by Myles King;
 18. Grand Jury minutes dated 4/16/25, four years after indictment for King's jail calls;
 19. COPLINK reports
- (6) On April 14, 2025, the Norfolk County District Attorney's Office handed counsel for Defendants an envelope containing additional discovery materials in this case. These items are listed

below, as numbered in the Commonwealth's
discovery notice¹:

3. Commonwealth's Notice of Discovery XXVIII (1 CD) (Bates Stamp #000023)
4. Facebook.com Preservation Request Response re Case #6246281 dated 7/14/21 (Bates Stamp #000024)
5. Facebook.com (Instagram) Preservation Request Response re Case #6246255 dated 7/14/21 (Bates Stamp #000025-26)
6. Milton Police Department Preservation Request to Snap Inc dated 7/14/21 (Bates Stamp #000027-28)
7. Snapchat Preservation Request Response re Submission #202089327 dated 7/14/21 (Bates Stamp #000029)
8. Snapchat Preservation Request dated 7/14/21 at 3:23 PM (Bates Stamp #000030)
9. Twitter Preservation Request Response re Case #0220004205 dated 7/14/21 (Bates Stamp #000031)
10. YouTube Preservation Request and Response dated 7/14/21 at 11:02 AM (Bates Stamp #000032-33)
11. Facebook Response re Case #6246281 dated 7/14/21 (Bates Stamp #000034)
12. Milton Police Department Chain of Custody of Evidence dated 7/13/21 (Bates Stamp #000035)
13. Facebook Response to Law Enforcement Online Requests dated 7/15/21 (Bates Stamp #000036)
14. Facebook Preservation Request Response re Case #6249433 dated 7/15/21 (Bates Stamp #000037)
15. Twitter Response re Case #0220125129 dated 7/15/21 (Bates Stamp #000038)

¹ None of this late discovery involves the Motion for Discovery re: **Proctor** and his team.

16. Facebook Preservation Request Response re Case #6249433 dated 7/15/21 at 11:03 AM (Bates Stamp #000039)
17. Milton Police Department Investigation Management Narrative Report of Sgt. Clifford- Murphy dated 7/27/21 (Bates Stamp #000040)
18. Milton Police Department Investigation Management Narrative Report of Lt. Michael Collins dated 11/10/21 (Bates Stamp #000041)
19. BRIC Identification Wanted Flyer (Bates Stamp #000042)
20. ATF Firearms Trace Summary dated 4/5/19 (Bates Stamp #000043)
21. ATF Firearms Trace Summary dated 4/5/19 (Bates Stamp #000044)
22. Milton Police Department Custody Report of Myles King dated 4/3/19 (Bates Stamp #000045-48)
23. Snapchat Response to Preservation Request re Submission #202089328 dated 7/14/21 (Bates Stamp #000049)
24. Snapchat Response to Preservation Request re Submission #202089328 dated 7/15/21 (Bates Stamp #000050-51)
25. Milton Police Department Master Card Detail for V. Lawson printed 7/29/21 (Bates Stamp #00005-54)
26. Commonwealth's Fusion Center BOLO for M. King dated 7/11/21 (Bates Stamp #000055)
27. Vehicle Detection Report for License Plate #124603 (Bates Stamp #000056-70)

28. MA Driver's License of D. Murray (Bates Stamp #000071)
29. MA Criminal History for D. Murray (Bates Stamp #000072-75)
30. Printout re D. Murray (Bates Stamp #000076-77)
31. MA Driver's License of J. Carrasco (Bates Stamp #000078)
32. MA Criminal History for J. Carrasco (Bates Stamp #000079-80)
33. Printout re J. Carrasco (Bates Stamp #000081)
34. MA Driver's License of M. Lacourt (Bates Stamp #000082)
35. MA Registration for 9RW161 (Bates Stamp #000083)
36. Printout re M. Lacourt (AKA Crawford) (Bates Stamp #000084-85)
37. MA Driver's License of S. Simmons (Bates Stamp #000086)
38. MA Criminal History for S. Simmons (Bates Stamp #000087)
39. Printout re S. Simmons (Bates Stamp #000088)
40. T-Mobile Exigent Request Form dated 7/10/21 (Bates Stamp #000089)
41. MA Driver's License of B. Gardener (Bates Stamp #000090)
42. Photograph Array photographs (Bates Stamp #000091-98)
43. MSP Eyewitness Identification Form (blank) (Bates Stamp #000099)
44. MSP Eyewitness Advisement Form (blank) (Bates Stamp #000100)
45. MSP Letter to Sprint Legal re Tower Dump Records dated 1/13/22 (Bates Stamp #000101)
46. MSP Letter to AT&T Legal re Tower Dump Records dated 1/13/22 (Bates Stamp #000102)

47. MSP Letter to Verizon Wireless re Tower
Dump Records dated 1/13/22 (Bates Stamp
#000103)
48. Fax Receipt dated 1/13/22 for 22SW0022 sent
to Sprint (Bates Stamp #000104)
49. BMC ADT Patient Info w/ Belongings Printout
(Bates Stamp #000105)
50. Email from LeBlond, William dated 7/10/21
(Bates Stamp #000106)
51. BMC Dispatch Call Report dated 7/10/21
(Bates Stamp #000107)
52. BMC Default Flowsheet Data dated 7/10/21
(Bates Stamp #000108-109)
53. Trp. Proctor notes re BMC (Bates Stamp
#000110)
54. Email to Trp. Proctor from BMC Det. M. Loud
(Bates Stamp #000111)
55. T-Mobile Expedited Response Form (Bates
Stamp #000112)
56. Crime Laboratory Returned to MSP
Detective Unit Form dated 3/14/22 (Firearm)
(Bates Stamp #000113)
57. Crime Laboratory Returned to MSP
Detective Unit Form dated 3/14/22 (casings)
(Bates Stamp #000114)
58. Crime Laboratory Returned to MSP
Detective Unit Form dated 8/17/21 (Bates
Stamp #000115)
59. Printout re M. King call on 7/10/21 (Bates
Stamp #000116)
60. MA Driver's License for D. Knight (Bates
Stamp #000117)
61. MA Driver's License for S. McElroy (Bates
Stamp #000118)
62. MA Criminal History for D. Knight (Bates
Stamp #000119)
63. Printout re D. Knight (Bates Stamp #000120)

64. Handwritten note re S. McElroy (Bates Stamp #000121)
65. MA Driver's License of E. Lawson (Bates Stamp #000122)
66. MA Criminal History for E. Lawson (Bates Stamp #000123-124)
67. MA State Police Crime Laboratory Expedited Analysis Request Form dated 7/14/21 (Bates Stamp #000125)
68. MSP Letter to Atty Tennen w/ GJ Subpoena for B. G. dated 7/22/21 (Bates Stamp#000126-127)
69. MSP Letter to Atty Sarno w/ GJ Subpoena for J. C. (Bates Stamp #000128-129)
70. MA Driver's License of H. Akram (Bates Stamp #000130)
71. MA Criminal History for H. Akram (Bates Stamp #000131)
72. Printout re H. Akram (Bates Stamp #000132)
73. Printout of Phone Log for 781-308-6961 (Bates Stamp #000133)
74. Typewritten Note re phone numbers associated w/ E. Lawson (Bates Stamp #000134)
75. Information re J. Jeannite (Bates Stamp #000135)
76. Email re J. Jeannite workup dated 7/12/21 (Bates Stamp #000136-137)
77. Printout re J. Jeannite (Bates Stamp #000138-139)
78. RMV Investigative Search Results for J. Jeannite (Bates Stamp #000140)
79. MA Driver's License for J. Jeannite printed 11/26/20 (Bates Stamp #000141)
80. MA Criminal History for J. Jeannite printed 11/26/20 (Bates Stamp #000142-145)
81. BRIC Report re J. Jeannite (Bates Stamp #000146)
82. Records Summary Report for ME Plate# 5C2444 (Bates Stamp #000147)
83. MA Recent Inquiries for ME Plate #5C2444

(Bates Stamp #000148)

84. Screenshot of report re 10/21/20 BPD arrest of J. Jeannite (Bates Stamp #000149-150)
85. MA Driver's License of J. Jeannite printed 8/11/21 (Bates Stamp #000151-152)
86. MA Criminal History of J. Jeannite printed 8/11/21 (Bates Stamp #000153-155)
87. MA Driver's License of L. King (Bates Stamp #000156)
88. Email from M. Collins re L. King Interview dated 10/13/21 (Bates Stamp #000157)
89. Phone information charts (Bates Stamp #000158-161)
90. Marquis Hot List (Bates Stamp #000162-163)
91. Simmons' Hot List (Bates Stamp #000164)
92. MA Driver's License of S. Simmons (w/ highlights) (Bates Stamp #000165)
93. MA Driver's License of M. Simmons (Bates Stamp #000166)
94. MA Criminal History for M. Simmons (Bates Stamp #000167)
95. MA Vehicle Registration for E. Lawson (Bates Stamp #000168)
96. Vehicle Registration for ME #124603 (Bates Stamp #000169)
97. Handwritten Notes re Maine Vehicles J. J. (Bates Stamp #000170)
98. MA Recent Inquiries for plate #124603 (Bate Stamp #000171-177)
99. MA Vehicle Registration for NEAV22 (Bates Stamp #000178)
100. RMV Investigative Vehicle Registration for 9VX293 (Bates Stamp #000179)
101. Call records for 781-308-6961 (Bates Stamp #000180-183)
102. Coplink/ACISS chart (Bates Stamp #000184)
103. Phone chart (Bates Stamp #000185)

104. MA Driver's License of L. Canty (Bates Stamp #000186)
105. MA Criminal History for L. Canty (Bates Stamp #000187)
106. MA Criminal History NCIC/III for L. Canty (Bates Stamp #000188-193)
107. CDRs for 781-308-6961 (Bates Stamp #000194-195)
108. Milton Police Department Advice of Rights dated 7/11/21 (Bates Stamp #000196)
109. Fax Cover Sheet to Trooper Mike from Police Department dated 10/1/21 (Bates Stamp #000197)
110. Quincy Police Department CAD Incident Report #21033829 (Bates Stamp #000198-200) (Previously provided in Notice of Discovery I, #29)
111. Milton Police Department Incident Report printed 7/26/21 (Bates Stamp #000201- 220)
112. Milton Police Department Incident Report printed 7/11/21 (Bates Stamp #000221- 225)
113. Milton Police Department Incident Narrative Report dated 7/11/21 (Bates Stamp #000226-227)
114. Milton Police Department Incident Report printed 7/11/21 (re 4/3/19 incident) (Bates Stamp #000228-232)
115. Milton Police Department Incident Report printed 9/7/21 (pages 21-26)

- (Bates Stamp #000233-238)
116. Quincy District Court Application for Criminal Complaint w/ signed affidavit (Bates Stamp #000239-242)
 117. MA Driver's License of M. King (Bates Stamp #000243)
 118. MA Criminal History Record of M. King (Bates Stamp #000244-245)
 119. Crime Laboratory Returned to MSP
Detective Unit Form dated 1/10/22 (Bates Stamp #000246)
 120. Crime Laboratory Returned to MSP
Detective Unit Form dated 8/17/21 (Bates Stamp #000247)
 121. Sample Summary Form (Bates Stamp #000248-249)
 122. Fax Receipt re T-Mobile Expedited
Response Form dated 8/4/21 (Bates Stamp #000250)
 123. T-Mobile Expedited Response Form (Bates Stamp #000251)
 124. MA Driver's License of S. Jeannite (Bates Stamp #000252)
 125. MA Criminal History Record of S. Jeannite (Bates Stamp #000253-256)
 126. Printout for S. Jeannite (Bates Stamp #000257)
 127. Phone numbers re Jeannite (Bates Stamp #000258-259)
 128. Individual Report re S. Jeannite (Bates Stamp #000260-264)
 129. CDRs of 781-308-6961 (Bates Stamp #000265)
 130. MA Driver's License of S. Petit-Homme (Bates Stamp #000266)

131. CDRs for 781-308-6961 (Bates Stamp #000267)
132. MA Criminal History of S. Petit-Homme (Bates Stamp #000268)
133. Printout for S. Petit-Homme (Bates Stamp #000269)
134. T-Mobile CALEA Lawful Intercept Worksheet dated 7/14/21 (Bates Stamp #000270)
135. T-Mobile CALEA Lawful Intercept Worksheet dated 7/11/21 (Bates Stamp #000271)
136. T-Mobile CALEA Lawful Intercept Worksheet dated 8/13/21 w/ fax receipt (Bates Stamp #000272-273)
137. Letter to T-Mobile re Case #3325019 dated 7/28/21 w/ T-Mobile Response email (Bates Stamp #000274-277)
138. Letter to T-Mobile re New Case dated 7/28/21 w/ T-Mobile Response email (Bates Stamp #000278-281)
139. Search Warrant packet, Docket number 21-SW-303, dated 7/11/21 (Bates Stamp #000282-296)
140. Search Warrant packet, Docket number 21-SW-306, dated 7/14/21 (Bates Stamp #00297-312)
141. Search Warrant packet, Docket number 21-SW-307, dated 7/14/21 (Bates Stamp #00313-328)
142. Search Warrant packet, Docket number 21-SW-329, dated 8/4/21 (Bates Stamp #00329-349)

143. Search Warrant packet, Docket number
21-SW-347, dated 8/13/21 (Bates Stamp
#000350-364)
144. Search Warrant packet, Docket number
21-SW-348, dated 8/13/21 (Bates Stamp
#000365-373)
145. MSP Report #27. Analysis of Tower
Dump Records Associated with the
Homicide Investigation of Marquis
Simmons by Trooper Keefe dated 1/19/24
(Bates Stamp #000374-376)
146. CALEA Lawful Intercept Worksheet
dated 7/11/21 with affidavit by Trp.
Proctor (Bates Stamp #000377-382)
147. CALEA Lawful Intercept Worksheet
dated 8/13/21 with affidavit by Trp.
Proctor (Bates Stamp #000383-389)
148. Notes of Trp. Proctor on W.B. Mason pad
(Bates Stamp #000390-407)
149. Notes of Trp. Proctor in spiral
notebooks (Bates Stamp #000408-424)
150. Handwritten notes re Jail Calls of Myles
King (Bates Stamp #000425-431)
151. ATF E-Trace Results dated 7/27/21 (Bates
Stamp #000432)
152. ATF Weapon Trace Request dated 7/13/21
(Bates Stamp #000433)
153. Quincy Police Department Report
Incident #21034247/1 by PO Donovan,
dated 7/13/21 (Bates Stamp #000434-
435)
154. BODE Supplemental DNA Case Report dated

- 3/20/25 by Kelsey Dawson (Bates Stamp #000436-437)
155. Milton Police Department Master Card
Detail for M. King print date 1/19/202
(Bates Stamp #000438)
156. MSP Returned to MSP Detective Unit Form
dated 8/17/21 (Bates Stamp #000439)
157. Email from Atty Sarno to Det. Pires
dated 7/14/21 (Bates Stamp #000440-441)
158. 7-Eleven Video w/ Proprietary player (1
USB) (Bates Stamp #000442)
159. 48 Blue Hill Ave video w/
Proprietary Player (1 USB) (Bates
Stamp #000442) (Converted video
provided Notice of Discovery II,
Disc 7)
160. 315 Hyde Park Ave. Cummings Hwy Video w/
Proprietary player (1 USB) (Bates Stamp
#000442) (Converted video provided Notice
of Discovery II, Disc 5)
161. 335Cummins_Washington Video w/
Proprietary player (1 USB) (Bates
Stamp #000442) (Converted video
provided Notice of Discovery II,
Disc 5)
162. 911 Radio Transmissions (1 USB) (Bates
Stamp #000442)
163. August 2019 Posts by Defendant (1 USB)
(Bates Stamp #000442)
164. Belvoir Photos (1 USB) (Bates Stamp
#000442)
165. Booking Video of M. King w/
Proprietary player (1 USB) (Bates
Stamp #000442) (Converted video

- provided Notice of Discovery I,
Item #61) .
166. Boston Traffic Cameras w/
Proprietary player (1 USB)
(Bates Stamp #000442) (Converted
video provided Notice of
Discovery II, Disc 7)
167. Boston Traffic Cameras - Blue Hills w/
Proprietary player (1 USB) (Bates Stamp
#000442) (Converted video provided
Notice of Discovery II, Disc 6)
168. Boston Traffic Cameras -
Washington-Columbus w/ Proprietary player
(1 USB) (Bates Stamp #000442) (Converted
video provided Notice of Discovery II,
Disc 7)
169. BRIC Cameras 4-6 pm (1 USB) (Bates Stamp
#000442)
170. Brook & Central Video (1 USB) (Bates
Stamp #000442)
171. HLS E13 1630-1800 Video (1 USB) (Bates
Stamp #000442)
172. MBTA Surveillance Video w/
Proprietary player (1 USB) (Bates
Stamp #000442) (Converted video
provided Notice of Discovery II,
Disc 4)
173. Milton Food Mart w/Proprietary player (1
USB) (Bates Stamp #000442)
174. Milton Police Department Crime Scene Pies
(1 USB) (Bates Stamp #000442)
175. QuickControlCenter Installer Program (1
USB) (Bates Stamp #000442)
176. SD Cards 18 Union Ave, Milton (Camera 1;
camera 06) (1 USB) (Bates Stamp #000442)

(Incomplete video provided Notice of
Discovery II, Disc 8)

- 177. Simmons Rap Music "Stimulus" (1 USB)
(Bates Stamp #000442)
- 178. State Yard Video w/
Proprietary player (1 USB)
(Bates Stamp #000442)
(Converted video provided
Notice of Discovery II, Disc
4)
- 179. Screenshot E13-Washington-Columbus 1
(Bates Stamp #000442)
- 180. Screenshot E13-Washington-Columbus 2 PTZ
(Bates Stamp #000442)
- 181. Screenshot of Mercedes on Granite Ave
1942 (1 USB) (Bates Stamp #000442)
- 182. Screenshot of ST-Central & Brooks (1 USB)
(Bates Stamp #000442)
- 183. Screenshot of Weld - Mercedes (1 USB)
(Bates Stamp #000442)
- 184. Screenshots of contents of Bates Stamp
#000442 (Bates Stamp #000443-471)

(7) On April 16, 2025, counsel for King
received NOD XXIX, which contained the following
new discovery item:

216. Norfolk Grand Jury Minutes dated
1/28/25 for King's jail calls (Bates Stamp
#000625-631).

(8) On May 19, 2025, counsel for King received via
U.S. Mail Notice of Discovery XXXI dated May 15,
2025 that contained 134 pages of the following

additional new discovery material as well as 4
new video files:

242. Milton Police Department Master Card

Detail for M. King (printed 5/2/25)

(Bates Stamp #001894-1896)

(Older version provided in Notice of Discovery

I, #32)

243. Death Certificate of M. Turner (Bates
Stamp #001897-1898)

244. Person Details for M. Turner (Bates Stamp
#001899-1901)

245. RMV photograph of M.

Turner (Bates Stamp

#001902) 247. Accurint

Search for M. Turner

(Bates Stamp #001903-

1904)

248. Milton Police Department Incident Report
dated 7/20/21 w/ GJ subpoena (Bates Stamp
#001905-1906)

249. Accurint search for 12 Belvoir, Milton
(Bates Stamp #001907)

250. LexisNexis Search Report for M. Turner
dated 4/30/25 (Bates Stamp #001908-1911)

251. MA Driver's License of Michael Turner
(printed 4/30/25) (Bates Stamp #001912)_

252. Knowledge of Myles King & Vehicle in
Question by PO Binda (Bates Stamp #001913)

253. Quincy District Court Criminal

Complaint, docket 2156CR001496

(Bates Stamp #001914)

254. Quincy District Court Application for Criminal Complaint (Bates Stamp #001915)
Milton Police Department Incident
Narrative Report of Sgt. Roper, Incident #2020000009954 dated 9/24/20 (Bates Stamp #001916)
255. Milton Police Department Incident
Narrative Report of Patrolman J.
Binda Incident #2020000009954 dated
9/24/20 (Bates Stamp #001917-1918)
256. Driver History for M. King (printed
5/19/21 (Bates Stamp #001919)
257. MA Vehicle Registration for 4RH822
(Bates Stamp #001920)
258. MA Driver's License for J. Jean-Baptiste (Bates Stamp #001921)
259. MA Criminal History for J. Jean-Baptiste (Bates Stamp #001922-1923)
260. MA Vehicle Registration for BGMCR
(Bates Stamp #001924)
261. MA Driver's License of M. King
(printed 9/24/20) (Bates Stamp #001925)
262. MA Criminal History of M. King
(printed 9/24/20) (Bates Stamp #001926-1927)
263. MA Driver History for M. King (Printed
9/24/20) (Bates Stamp #001928)
264. MA Uniform Citation #809595AA dated
9/25/20 (Bates Stamp #001929-1930)
265. MA Driver's License for M. King
(printed 7/11/21) (Bates Stamp #001931)
266. MA Recent Inquiries for Plate No.
124603 printed 7/11/21) (Bates Stamp
#001932- 1936)

(Previously provided document was
printed on 7/14/21 - Bates Stamp
#000171- 177)

267. MA Driver's license of J. Jeannite
(printed on 7/11/21) (Bates Stamp
#001937) (Previously provided
document was printed on 11/26/20-
Bates Stamp #000141)

268. MA Recent Inquires for Reg# 6C8611
(printed 7/11/21) (Bates Stamp #001943)

269. MA Driver's License for R. Peele
(printed 7/11/21) (Bates Stamp #001944)

270. MA Criminal History for R. Peele
(printed 7/11/21) (Bates Stamp #001945-
1946)

271. RMV Investigative Vehicle

Registration for Reg # 1CWM93 (printed
7/11/21) (Bates Stamp #001947)

272. MA Driver's License for R. Bell
(printed 7/11/21) (Bates Stamp #001948)

273. MA Driver's License H. Akram (printed
7/10/21) (Bates Stamp #001949)

274. MA Criminal History for H. Akram
(printed on 7/10/21) (Bates Stamp
#001950-1951) (Previously provided
document was printed on 7/29/21-
Bates Stamp #000131)

275. MA Vehicle Registration for Reg #2CGM21
(printed on 7/10/21) (Bates Stamp #001952) 279. MA
Driver's License for A. Yusuf (printed on
7/11/21) (Bates Stamp #001953)

(Previously provided document was
printed on 12/23/20-Notice of
Discovery XVIII, #1 and #2)

280.MA Criminal History for A. Yusuf (printed
ori 7/11/21) (Bates Stamp #001954-1957)

281.MA Driver's License for J. Gibbs
(printed on 7/11/21) (Bates Stamp
#001958) (Document provided on two
prior occasions: document printed
on 7/29/21-Bates Stamp #000131;
document printed on 12/23/20 -
Notice of Discovery XVIII, #1 and
#2)

282.Warrants printout for J. Gibbs
(printed on 7/11/21) (Bates Stamp
#001959-1960) 283.BRIC Wanted Flyer
for J. Gibbs (Bates Stamp #001961)

284.COPLink for Traffic Collision dated
4/5/21 (Bates Stamp #001962-1964)

285.MA Driver's License for T. Thomas (printed
7/11/21) (Bates Stamp #001965)

286.BRIC Dailey Summary dated 4/20/21 (Bates
Stamp #001966)

287.BRIC Dailey Summary dated 2/11/21 (Bates
Stamp #001967-,1968)

288.MA Driver's License for D. Edwards
(printed 7/11/21) (Bates Stamp #001969)

289.MA Driver's License for E. Lawson
(printed 7/10/21) (Bates Stamp
#001970) (Previously provided
document printed on 7/29/21-
Bates Stamp #000122)

290. MA Driver's License of M. Johnson
(printed 9/17/21) (Bates Stamp
#001971) 291. Accurint search for M.
Johnson (printed 9/17/21) (Bates
Stamp #001972)

292. MA Driver's License of M. Turner (printed
7/20/21) (Bates Stamp #001973)

293. MA Driver's Licensee of V. Haase (printed
7/21/21) (Bates Stamp #001974)

294. MA Driver's License of M.
Rodriguez (printed 7/20/21) (Bates
Stamp #001975) 295. Stickie with note
(Bates Stamp #001976)

296. MA Vehicle Registration for NE43ZS
(printed 7/14/21) (Bates Stamp #001977)

297. MA Driver's License of I. Mercado-
Vargas (printed 7/14/21) (Bates Stamp
#001978) 298. Criminal History for I.
Mercado-Vargas (Printed 7/14/21) (Bates
Stamp #001979)

299. Driver History for I. Mercado-Vargas
(printed 7/14/21) (Bates Stamp #001980-
1981)

300. Still from Washington-Columbus 2PTZ
7/10/21 at 4:30 pm (Bates Stamp #001982)

301. Still from Washington-Columbus 2 PTZ
7/10/21 at 5:14:57 pm (Bates Stamp
#001983) Still (zoomed) from Washington-
Columbus 2 PTZ 7/10/21 at 5:14:57 pm
(Bates Stamp #001984)

302. Still (zoomed) from Central & Brooks
7/10/21 at 7:35:16 pm (Bates Stamp
#001985)

303. Still from Central & Brooks 7/10/21 at
7:35:16 pm (Bates Stamp #001986)

. 305. Still (zoomed) from Central & Brooks
7/10/21 7:35:16 pm (Bates Stamp #001987)

306.MA Driver's License of M. Sesay (printed
7/15/21) (Bates Stamp #001988)

307.MA Driver's License of J. Bangura (printed
7/15/21) (Bates Stamp #001989-1990)

308.MA Driver's License of T. Goodman (printed
7/14/21) (Bates Stamp #001991)

309.MA Driver's License of P. Boursiquot
(printed 7/10/21) (Bates Stamp #001992)

310.MA Vehicle Registration of Reg #6FG232
(printed 7/10/21) (Bates Stamp #001993)

311.MA Driver's License of T. Davis (printed
7/10/21) (Bates Stamp #001994)

312.MA Vehicle Registration for Reg #3KEL71
(printed 7/10/21) (Bates Stamp #001995)

313.MA Driver's License of M. Nelson

(printed 7/10/21) (Bates Stamp

#001996) 314.Criminal History for M.

Nelson (printed 7/10/21) (Bates Stamp

#001997-2003) 315.MA Driver's License

of M. Simmons (printed 7/11/21)

(Bates Stamp #002004)

(Previously provided document printed on

7/13/21 - Bates Stamp #000166)

316. MA Driver's License of F. Carter
(printed 7/11/21) (Bates Stamp #002005)

317. RMV Investigative Search Results for
12 Belvoir (mailing) (Bates Stamp
#002006)

318. RMV Investigative Search Results for 12
Belvoir (residential) (Bates Stamp #002007)

319. RMV Investigative Search Results for
10 Belvoir (mailing) (Bates Stamp
#002008)
320. RMV Investigative Search Results for 10
Belvoir (residential) (Bates Stamp #002009)
321. MA Driver's License of S. Atkins-Gamble
(printed 7/13/21) (Bates Stamp #002010)
322. Email from R. Whiteman to Det
Cimildoro dated 7/21/21 @ 7:46 am
(referring to 2 Granite Ave, Milton)
(Bates Stamp #002011)
323. Email from A. Atkins to Det.
Cimildoro dated 7/15/21 @ 7:38 pm
(referring to Stimulus video previously
provided - Bates Stamp #000442) (Bates
Stamp #002012)
324. Original email dated 7/10/21 @
7:38 (referring to Ring video
previously provided - Discovery I,
#46) (Bates Stamp #002013)
325. Original email dated 7/10/21 @ 11:15
pm (referring to 71 Oakcrest St video
previously provided in Discovery II,
Disc 5) (Bates Stamp #002014)-
326. Original email dated 7/10/21 @
11:17 pm (referring to above 71
Oakcrest St video previously provided
in Discovery II, Disc 5) (Bates Stamp
#002015) Original email dated 7/11/21
@ 10:25 am (referring to Ring video
from 45 Belvoir Road) (Bates Stamp

#002016)

327. Original email dated 7/11/21 @ 3:57 pm
(referring to video of from 54 Essex
Street of a "Black car'') (Bates Stamp
#002017)

328. Original email dated 7/15/21 @ 10:29
am (referring to video from 32 Decker St)
(Bates Stamp #002018)

329. Original email dated 7/15/21 @10:31
am (referring to video from 32 Decker St)
(Bates Stamp #002019)

330. Original emails dated 7/27/21 re
Milton Food Mart videos (videos
previously provided - Bates Stamp
#000442) (Bates Stamp #002020-2023)

331. Handwritten notes of PO Colligan (Bates
Stamp #002024-2025)

332. Video from 32 Decker Street (1 CD)
(Bates Stamp #002026)

333. Video from 32 Decker Street (2nd video)
(1 CD) (Bates Stamp #002026)

334. Video from 45 Belvoir Road (1 CD) (Bates
Stamp #002026)

335. Video from 54 Essex Street (1 CD) (Bates
Stamp #02026)

(9) On June 12, 2025, the Commonwealth filed Discovery
XXXII which contained the following documents:

337. Massachusetts State Police Crime Laboratory
Audits (1 USB) (Bates Stamp #002028) 2022
Reaccreditation Assessment

Assessment Follow-up (5 items) Assessment
Remediations (6 items) Assessment Report (5 items)

2022 DNA QAS Audit (8 items)

2023 MROS (NIBIN) Audit (3 items)

2023 Off-Site ANAB Surveillance (Document Review)
Assessment ANAB Assessment Report Plan (2 items)

230601-MASP-Cont of Ace (1 page) 2024 ANAB
Surveillance Assessment (3 items)

2024 DNA Qas Audit (11 items)

2025 ANAB location Evaluation - Roxbury (4 items)

2025 Off-Site ANAB Surveillance (Document Review)
Assessment (4 items)

Criminalistics File Folder - Lab #21-15498

Criminalistics Photographs

21-15498 (2 items)

Plastic evidence bags (vile 2-1.1)

21-15498 (1) (Previously provided in Notice of
Discovery IX) Crim 2 (2 items)

2 Brown paper evidence bags Crim 3 (6 items)

Envelopes and casings

12 photographs (sweatshirt, do rag/cap)

Crim 2 (2 items) (Previously provided in Notice of
Discovery IX) 2 Brown paper evidence bags

Crim 3 (6 items) (Previously provided in Notice of
Discovery IX) Envelopes and casings

Criminalistics File Folder (PDF) (32 pages)

(Previously provided 29 pages in Notice of
Discovery IX) Additional pages:

Two copies of 21-15498-2 and 21-15498-6 submission
forms (2 pages)

Homicide/Death Report - Unapproved/open Report (1
page) (Previously provided in Notice of Discovery
IX, Link 3, UMS Document Correspondence Folder)

DNA Electronic Data, Raw quantitative Data &
Reference Binder 21-15498

Montgomery, Jennifer E-Data

MCE2021-0322

12 items MCE2021-0333

14 items MRT2021-0240.eds MRT2021-0254.eds

Reference Binder

STRmix Settings

OneDrive_2025-06-12

Archived STRmix Settings and Reference Material

7 items

9 PDF files

9 PDF files

Porto, Andre

MEX2022-0088

MCE2022-0192

10 items MCE2022-0208

4 items MRT2022-1050.eds

Reference Binder

15 PDF files

UMS Document Correspondence (10)

(9 items previously provided in Notice of
Discovery IX)

New material (1 document 16 pages):

Authorization of Exhaustive DNA Testing (unsigned)
(1 page) case Status Notification (1 page)

Norfolk Superior Court Clerk's Notice (1 page)

Court Order (Kruppl J.) 9/8/22 (1 page)

Commonwealth's Motion for Order to Compel

Exhaustive DNA Testing (2 pages)

Protocols (07-10-2021 through 6-2-2025) Crime
Scene Response Unit (CSRU)

Published (27 Items)

Retired (247 Items)

Crime Scene Services Section (CSSS) Published (12
items)

Retired (247 items) Criminalistics Unit

Published (62 items)

Retired (247 items) DNA Unit

Published (123 items)

Retired (247 items)

Firearms Identification Section.(FIS) Published (8
items)

Retired (247 items)

General Laboratory Policies and Manuals Published
(19 items)

Retired (247 items) Sendout

Published (10 items)

Retired (247 items) Discovery Letter Dated 6/2/25
(2 pages)

Chain of Custody Report (17 pages)

(14 pages previously provided in Notice of
Discovery IX)

CODNA File Folder Batch #MEX2022-0088 (36 pages)

New materials:

Addenda page was blank1 now filled out

DNA Exemplar Report 2 by Brittany Colby dated
12/22/22 (3 pages)

DNA-STR/Y-STR Exemplar Report by Brittany Colby
dated 7/21/22 (3 pages) Analyst Form (1 page)

Methods Form dated 12/20/22 (1 page) Methods Form
dated 7/21/22 (1 page)

DNA File Folder 1- Lab #21-15498 (26 pages)

(25 pages previously provided in Notice of
Discovery IX) New materials:

Analyst Form (1 page)

Addenda page was blank, now filled out

DNA File Folder 2- Lab #21-15498 (87 pages)

(64 pages previously provided in Notice of
Discovery IX)

. New materials:

Addenda page has additional information (1 page)

Analyst Form (1 page)

DNA Testing Report 4 by Jennifer Montgomery dated
3/6/23 (5 pages) (Report previously provided in
Notice of Discovery XV)

DNA Testing Report 3 by Jennifer Montgomery dated 5/10/22 (4 pages) (Report previously provided in Notice of Discovery VII)

DNA Testing Report 2 by Jennifer Montgomery dated 7/27/21 (3 pages) (Report previously provided in Notice of Discovery IV)

Additional worksheets (10 pages)

Sendout File Folder (16 pages)

Sendout Page Summary (1 page)

DNA Assignment Review Form (1 page) Methods Form (start date 10/27/22) (1 page) MSP Report to BODE dated 10/26/22 (3 pages) Evidence Sendout Request form (1 page)

Authorization of Exhaustive DNA Testing Form (blank) Clerk's Notice re Exhaustive Testing (1 page)

Court Order (Krupp, J.) 9/8/22 (1 page)

Commonwealth's Motion for Order to Compel Exhaustive DNA Testing (2 pages) Two photographs of plastic bag with vial 2-1.1 (1 page)

UPS Shipment Receipt dated 10/31/22 (2 pages)

Released to BODE Technology Form dated 10/31/22 (1 page)

DNA Electronic Data, Raw Quantitative Data &
Reference Binder #21-15715

MEX2022-0164

MCE2022-0344

7 items MRT2022-0254.eds

Reference Binder 2022

Control & Ladder Ref. Profiles Fusion (PF) (4
files) Yfiler (Y) (4 files)

Data Analysis Reference Material (9 files)
GeneMapper Settings (6 files) Instrument or Kit
Specifications (5 files) STRMix (14 files)

2023

Control & Ladder Ref. Profiles Fusion (PF) (4
files) Yfiler (Y) (4 files)

Data Analysis Reference Material (9 files)
GeneMapper Settings (4 files) Instrument or Kit
Specifications (4 files) STRMix (12 files)

LIMS Document Correspondence (8)

(6 submissions previously provided in Notice of
Discovery X)

Additional materials:

BODE Supplemental DNA Case Report dated 1/13/23 by Sarah Siddons (Previously provided in Notice of Discovery XIII)

BODE Supplemental DNA Case Report dated 3/20/25 by Kelsey Dawson (Provided in Notice of Discovery XXVIII, Bates Stamp #000436-437)

Protocols 07-13-2021 through 6-03-2025 Crime Scene Services Section (CSSS)

Published (12 items)

Retired (247 items) Criminalistics Unit

Published (62 items)

Retired (247 items) DNA Unit

Published (123 items)

Retired (247 items)

Firearms Identification Section (FIS) Published (8 items)

Retired (247 items)

General Laboratory Policies and Manuals Published (19 items)

Retired (247 items)

21-15715 Discovery Letter dated 6/3/25 (2 pages)

Case Conversation Log Lab #21-15715 (10 pages) (7

pages provided in Notice of Discovery X)

Chain of Custody Report - Lab #21-15715 (9 pages)
(8 pages provided in Notice of Discovery X)

CODNA File Folder Batch #MEX2022-0164 (47 pages)
(31 pages provided in Notice of Discovery X) New
materials:

Addenda page has new information (1 page)

DNA Exemplar Report by Maureen McCabe dated
10/26/23 (3 pages) (unrelated)

CODIS Status Notification dated 7/29/22 (1 page)
(unrelated to case) SDIS Pedigree Details Reports
(3 pages) (unrelated to case)

CODIS Search/Upload Request (2 pages) (unrelated
to case) SDIS Specimen Details Report (2 pages)
(unrelated to case) CODIS Search/Upload Request (1
page) (Unrelated to case)

DNA -STR Exemplar Report by Brianna Kiesel dated
7/14/22 (2 pages)

Analyst Forms (2 pages) Methods Form (1 page)

338. Curriculum Vitae (1 USB) (Bates Stamp
#002028) 3

Biello, John 2025 (6 pages)

Bird, Lindsay 2025 (4 pages)

Bourque, Kristin 2025 (7 pages)

Bowser, Kathryn 2024 (3 pages)

Brown, Jessica 2025 (4 pages)

Canlas, Sofa 2025 (2 pages)

Cochrane, Edward 2025 (3 pages)

Conroy, John 2025 (5 pages)

Crook, Sherri 2025 (4 pages)

Cunningham, Brian 2025 (3 pages)

Despres, Emily 2025 (2 pages)

Devlin, Stephanie 2025 (4 pages)

Duval, Elizabeth 2025 (5 pages)

Federchuck, Taylor 2025 (3 pages)

Gould, Kathleen 2025 (6 pages)

Heffernan, Kenneth 2025 (4 pages)

Hodgdon, Ryan 2025 (4 pages)

Kiesel, Brianna 2025 (2 pages)

King, Keley 2025 (5 pages)

Leire, Christine 2025 (7 pages)

Martin, Christopher 2025 (2 pages)

McCabe, Maureen 2025 (4 pages)

Montgomery, Jennifer 2025 (4 pages)

Muise, Autumn 2025 (2 pages)

Murphy, Laurie 2025 (6 pages)

Oliver, Emily 2025 (2 pages)

3 The CV's and proficiency testing provided are for the analysts as identified on the Analyst Forms that can be found in the CODNA File Folder Batch #ME2022-088, DNA File Folders 1 and 2, and CODNA File Folder Batch #MEX2022-0164. i\ddditional materials are based on analysts previously identified by the Massachusetts State Police Crime Laboratory (See Notice of Discovery IX, X, and XVI). CV's and/or proficiency testing for other lab employees are available and can be provided upon request to the undersigned ADA. All Curriculum Vitae are as of May 27, 2025, except Kathryn Bowser's, which is as of October 1, 2024.

Porto, Andre 2025 (2 pages)

Rabel, Betsy 2025 (3 pages)

Randolph, Brianna 2025 (3 pages)

Richardson, Madeline 2025 (3 pages)

Saleem, Saan 2025 (3 pages)

Senior, Sydney 2025 (3 pages)

Sheehan, Matthew 2025 (3 pages)

Tanguay, Colleen 2025 (5 pages)

Zimmermann, Alicia 2025 (3 pages)

339. Massachusetts State Police Nonconformity
Log_OS-29-2025 (EXCEL) w/ Instructions (1 USB)
(Bates Stamp #002028)

340. Proficiency Testing (1 USB) (Bates Stamp
#002028) Adams, Troy (3 items)

Biello, John (39 items)

Bird (Allgeier), Lindsay (25 items) Bourque
(Bomal), Kristin (36 items) Bowser, Kathryn (12
items)

Brown (Hieser), Jessica (24 items) Canlas, Sofa (7
items)

• Cochrane, Edward (19 items) Colby, Brittany
(6 items) Combs, Emma (3 items) Conroy, John (19
items)

Crook (Menendez), Sherri (56 items) Cunningham,
Brian (49 items) Despres, Emily (25 items)

Devlin, Stephanie (13 items) Duval, Elizabeth (28
items) Federhook, Taylor (18 items) Francoeur,
Douglas (6 items) Gould, Kathleen (36 items) Hart,
Jessica (34 items) Heffernan, Kenneth (35 items)
Hodgdon, Ryan (25 items) Kiesel, Brianna (9 items)

King, Keley (39 items) Leire, Christine (40 items)

Martin, Christopher (6 items) McCabe, Maureen (28
items) Micele (Cronan), Nicole (23 items)

Montgomery, Jennifer (37 items) Muise, Autumn (5
items)

Murphy (Jennings), Laurie (27 items) Oliver, Emily
(8 items)

Porto, Andre (9 items) Rabel, Betsy (55 items)

Randolph, Brianna (10 items) Richardson, Madeline
(10 items) Saleem, Saan (18 items) Senior, Sydriey
(10 items) Sheehan, Matthew (33 items)

Tanguay (Campbell), Colleen (23 items) Zimmermann,
Alicia (60 items)

(7) The Commonwealth has requested discovery packet from BODE for the testing performed in this matter. It is anticipated this will be provided on or before July 1, 2025.

(8) This newly disclosed discovery contains exculpatory information that will require defense counsel to track down and interview witnesses but also will require investigation to undermine some of the new information the Commonwealth will seek to introduce against King.

(9) Defense counsel must review, discuss, investigate this new evidence, and incorporate into the defense strategy.

(9) Because of the late discovery, instead of preparing for trial with the discovery that was previously

disclosed in the case, counsel must now process all of this new discovery and reformulate the defense.

- (10) Counsel for the defendant King articulated in the motion that she is reviewing six search warrants and affidavits that had not been previously disclosed to the defense. Counsel for the defendant indicates an intent to file Motions to Suppress the evidence obtained as a result of these warrants.
- (11) One of the Motions the defense has indicated it will move to suppress is CSLI evidence that was obtained with a search warrant in 2021. The CSLI evidence was submitted to the Norfolk Grand Jury in 2021. The Commonwealth intends on introducing this evidence at trial and is a critical piece of evidence to the Commonwealth's case.
- (12) On June 17, 2025, the Court (Doolin, J.), issued a ruling in this matter, and in Commonwealth v. Chionchio, De Los Santos and Johnson, which requires the Commonwealth to make further productions regarding Former Trooper Proctor's work phone and personal phone. The Commonwealth expects that this further examination will also be time consuming and may require further protective orders to comply with the court's order. It will take time to review the new materials being produced to the defense and to conduct a thorough review of former Trooper Proctor's personal phone, which is currently not in the custody of the Commonwealth.
- (13) On June 2, 2025, the Court (Doolin, J.) determined that bail was appropriate in this matter. The court noted that the defendant is indigent and that he has

been detained for the past four years. The court noted in its Findings and Order that a reason for setting a cash bail in this matter was the "Commonwealth has recently provided discovery, that included hundreds of pages of additional discovery including six search warrants, forensic reports, investigator's notes, police reports and other documents that have not previously been disclosed despite the age of the case". As a reason for bail, the court cited the defendant's strong family support and minimal record.


- (14) Counsel for the defendant, who noted that the defendant has been held since he was 21 years old, has represented to the Court and to the Commonwealth, that the defendant is unable to post more than \$2500.
- (15) The release conditions proposed by the court, and accepted by the parties, would require the wearing of a GPS device, 24-hour home confinement and that the defendant could only leave his home for attorney for legal, medical or probation appointments.
- (16) Since the parties are two months from the September trial date, the parties will not be able to litigate the necessary motions to suppress and dismiss, nor will the defendant be able to properly investigate any new defenses that may have arisen since the trial date was scheduled in 2024.
- (17) Without a continuance of the September trial date, the parties will not be able to litigate the necessary motions and prepare for a First-Degree Murder trial. It is due to these late arising issues, including Judge Doolin's June 17, 2025, Memorandum of Decision

and Order on Defendant's Motions regarding Proctor's Work and Personal Cell Phone, that the parties are not able to try this matter in September.

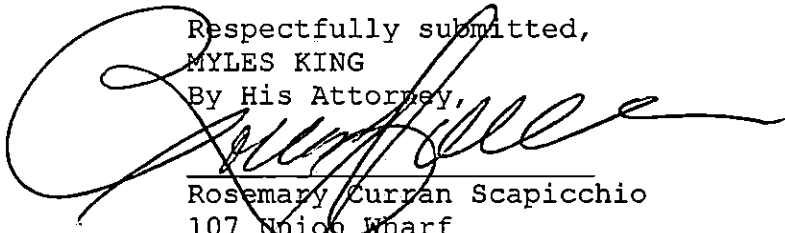
- (18) The Commonwealth conditioned its agreement for a reduction in King's bail on King's assent to a continuance of the September trial date after the Commonwealth consulted with the victim's family.
- (19) A continuance in this matter is in the best interest of all parties. In light of the continuance, the currently imposed bail of \$100,000 would result in the defendant being detained until the matter can be tried.

Respectfully Submitted
For the Commonwealth

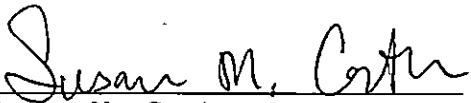
MICHAEL W. MORRISSEY
DISTRICT ATTORNEY

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Respectfully submitted,
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By His Attorney,


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Respectfully Submitted
BRIANNA GARDENER
By Her Attorney

A handwritten signature in cursive script, reading "Susan M. Costa", written over a horizontal line.

Susan M. Costa
185 Devonshire Street
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Boston, MA. 02110