



People v. Arnold – Fact Pattern #3

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STIPULATIONS

Procedural

1. Teams must call one witness but may call both.
 - a. Prosecution must/may call Ricky Dander
 - b. Prosecution must/may call Chris Manchego
 - c. Defense must/may call Dallas Rose
 - d. Defense must/may call Jordan Arnold
2. Teams will inform the competition director by **12:00pm on the Sunday prior to Competition** which witness(es) they are planning to call.
3. Witnesses may be played by either gender.
4. Counsel stipulate that they have gathered and exchanged in discovery all witness statements.
5. Counsel stipulate that they had their witnesses review their statements before trial, and the witnesses signed a certification, under penalty of perjury, that they have reviewed their statement and determine that the answers/information contained therein is accurate and they have no other information relevant to the matters discussed.
6. Counsel may not request, nor will the Court grant, any additions or modifications to the jury instructions.
7. The defendant has been deemed competent to stand trial.
8. Any and all notice requirements under the Federal Rules of Evidence have been constructively met.
9. All exhibits in the file are authentic and the original of that document unless otherwise noted on the exhibit or established by the evidence.
10. All necessary search and arrest warrants were issued and are valid. No objection will be entertained or granted regarding searches or warrants.
11. No chain of custody issues exists regarding the physical evidence collected. No objection will be entertained regarding chain of custody.
12. The prosecution cannot withdraw any charges. The defense may choose to not ask for the affirmative defense instruction, but must give notice during meet and confer.
13. No witness may assert the fifth amendment to avoid testifying.

14. The officer who took Jordan Arnold's statement, James Lemon, has been deemed unavailable.

Substantive

1. This trial is taking place on September 28, 2021.
2. All witnesses recognize and can identify all exhibits.
3. Ricky Dander and other members of the Slicers were convicted under the federal RICO statute. All grand jury testimony from that docket was sealed.
4. The Slicers have not been formally declared a gang by any government agency, police department, or any other organization.
5. The victim, Nick Schmidt, is a 15-year-old resident of Jaffa, New Orange located on the west side of Clementine County. Nick Schmidt suffered a stab wound above his collar bone causing him to have substantial pain. Nick Schmidt is in the hospital due to his injuries incurred on February 28, 2021 and is declared to be unavailable.
6. Officer Chris Manchego was working undercover in the Slicers, using the alias "Chris Hanley."
7. Officer Chris Manchego was put on Administrative Leave on March 2, 2021, and is currently under investigation by Internal Affairs due to Manchego's actions in the Slicers and on February 28, 2021.
8. The controlling law in this jurisdiction is as follows: a criminal defendant is entitled to a self-defense instruction so long as there is any admissible evidence produced at trial from which a reasonable juror could conclude the defendant acted in self-defense.
9. Exhibit E is a screenshot of Chris Manchego's phone. The messages were sent on February 27, 2021, at 11:49pm.
10. The Defense may choose to request the self-defense instruction provided be read to the jury at the end of the trial.
11. Defendant has been charged under the Orange Penal Code.
12. Exhibit G has been deemed admissible.

INDICTMENT

<p>THE PEOPLE OF THE STATE OF NEW ORANGE</p> <p>Prosecution,</p> <p>Vs.</p> <p>JORDAN ARNOLD</p> <p>Defendant.</p>	<p>No. 2021 – CV- 18962 – CR</p> <p>April 26, 2021</p>
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CHARGING STATUTES 21 OPC § 17.02; § 17.03

COUNT ONE: On or about February 28, 2021, within the County of Clementine, State of New Orange, the defendant, Jordan Arnold, did, with intent to cause physical injury to Nick Schmidt, caused physical injury to Nick Schmidt or to a third person by means of a deadly weapon or dangerous instrument in violation of 21 OPC § 17.02.

COUNT TWO: On or about February 28, 2021, within the County of Clementine, State of New Orange, and the Southern District of New Orange, the Defendant, Jordan Arnold, did, with intent to cause serious physical injury to Nick Schmidt, caused such injury to Nick Schmidt or to a third person by means of a deadly weapon or a dangerous instrument in violation of 21 OPC § 17.03.

A TRUE BILL ISSUED BY THIS GRAND JURY ON APRIL 26, 2021.

Adam Berger

FOREPERSON: ADAM BERGER

APPROVED: GENE JOHNSON
District Attorney, Clementine County

**THE GRAND JURY OF THE COUNTY OF CLEMENTINE
STATE OF NEW ORANGE**

THE PEOPLE OF THE STATE OF NEW ORANGE

Prosecution,

Vs.

No. 2021 – CV- 18962 – CR

JORDAN ARNOLD

April 26, 2021

Defendant.

**REPORTER’S TRANSCRIPT OF GRAND JURY PROCEEDINGS
Monday, April 26, 2021**

APPEARANCES,

JOSEPH C. O’NEIL,

Deputy District Attorney of the County of Clementine, representing the Office of the District Attorney.

ALYSSA PASINOS, duly appointed and sworn as the official shorthand reporter of the Clementine County Grand Jury.

**ALYSSA PASINOS, CSR NO. 1799
Official Reporter**

2 The above titled matter came on for hearing for the Clementine County Grand Jury at the hour of
3 8:00 a.m. on April 26, 2021, at the Clementine County Courthouse, 176 Cuties Avenue,
4 Valencia, New Orange 67264.

5 **GRAND JURY TESTIMONY OF RICKY DANDER**

6

7 **FOREPERSON:** We have quorum. There are no unauthorized persons present.

8 The witness, upon being first duly sworn, was examined and testified as follows:

9

10 **BY MR. O'NEIL:**

11 Q: Please state your name for the record.

12 A: Ricky Dander

13 Q: Are you known by any other names?

14 A: Yes, sometimes my friends call me Ricky Delight.

15 Q: Friends like those in the Slicers?

16 A: What are the Slicers?

17 Q: The gang that was just implicated in a recent RICO case, which you were a defendant of.

18 A: Right, yeah, the Slicers call me Ricky Delight.

19 Q: How long have you been in the Slicers?

20 A: About 5 years.

21 Q: Is that the same gang that Jordan Arnold is in?

22 A: I don't know if Jordan is actually in it.

23 Q: Is that the same gang involved in a stabbing at Greece Pizza?

24 A: Yes.

25 Q: Was Jordan there?

26 A: Jordan was there, but I don't know if Jordan is in the Slicers. We have a long initiation
27 process.

28 Q: Why are you testifying today against Jordan Arnold?

29 A: I was offered a deal that if I testify against Jordan Arnold and cooperate in their
30 investigation of the Slicers, that I'll be able to walk.

31 Q: What do you mean "walk?"

32 A: They are going to drop the charges.

- 33 Q: What charges would that be?
- 34 A: Same as the ones Jordan's facing, I guess they think I hurt someone at Greece Pizza.
- 35 Q: So you were charged with assault?
- 36 A: Yep. But I didn't even do anything. That's probably why they offered me a deal, they
37 knew they couldn't prove it.
- 38 Q: Alright, how were you involved in the stabbing at Greece Pizza?
- 39 A: I was there when the fight broke out, got a couple of cuts and bruises from it.
- 40 Q: When was that?
- 41 A: February 28, 2021.
- 42 Q: Who's idea was it to go to Greece Pizza?
- 43 A: Jordan's, we normally never go there.
- 44 Q: Why is that?
- 45 A: Well Greece Pizza is in Peelers' territory.
- 46 Q: Who are the Peelers?
- 47 A: A gang that runs the west side of Clementine County.
- 48 Q: Where is Slicers' territory?
- 49 A: On the east side.
- 50 Q: Are you the only two gangs?
- 51 A: No, there's a number of other smaller gangs, none as hard as the Slicers though, even
52 though Peelers try.
- 53 Q: So why go to Greece Pizza if it's not in your territory?
- 54 A: Well, Jordan suggested it and no one in the Slicers is scared of some little Peeler, so we
55 went.
- 56 Q: Did you bring anything with you?
- 57 A: Slicers always have a knife on them.
- 58 Q: Did you have a knife with you that night?
- 59 A: I did.
- 60 Q: Did Jordan?
- 61 A: Probably.
- 62 Q: How many people went with you to Greece Pizza?
- 63 A: It was Jordan, me, Chris Hanley and three other people.

- 64 Q: Who is Chris Hanley?
- 65 A: Chris is one of the newer Slicers, been in for about 2 years.
- 66 Q: Were they all Slicers?
- 67 A: I assumed so, I don't know everyone who is in or not.
- 68 Q: How can you tell then if someone is a Slicer or a Peeler?
- 69 A: If you know you know.
- 70 Q: There is nothing specific?
- 71 A: I mean each gang has their own colors, clothing style, phrases, and other things that can
- 72 tell us who is who.
- 73 Q: What are the Slicers?
- 74 A: Man, I'm already in enough hot water with them for talking to you, I'm not telling our
- 75 secrets.
- 76 Q: Does the phrase "Let 'em slice!" mean anything to you?
- 77 A: All I am going to say is that you shouldn't say it if you don't mean it.
- 78 Q: We can move on, what time did you go to Greece Pizza on February 28, 2021?
- 79 A: It was like 1 in the morning, somewhere around there. We had just gotten done with some
- 80 initiation stuff and were all super hungry.
- 81 Q: Were there other people in Greece Pizza when you got there?
- 82 A: Yeah, there was a group of like 5-6 guys at the counter ordering pizza.
- 83 Q: Do you recognize this floor plan? **[EXHIBIT B]**
- 84 A: Looks like the floor plan to Greece Pizza.
- 85 Q: Where was the group standing when you walked in?
- 86 A: Right at the counter.
- 87 Q: Where was your group standing?
- 88 A: Behind them.
- 89 Q: What's on either side of you?
- 90 A: I guess you would call them half walls; they separate the tables from where you can wait
- 91 in front of the door to get to the counter.
- 92 Q: What happened when you walked into Greece Pizza?
- 93 A: We stood in line and then the dude behind the counter said that they were serving up the
- 94 last pizza.

- 95 Q: How did your group take that?
- 96 A: We were all pissed. I mean we were starving and had driven there and now there is no
97 pizza. Jordan was really pissed.
- 98 Q: What happened after the employee announced they were serving the last pizza?
- 99 A: Well, the guys in front of us made some comment about how they were getting the last
100 slice of pizza, which made Jordan even more angry.
- 101 Q: What happened next?
- 102 A: I am not really sure what happened, because I was behind Jordan and Chris, but all of a
103 sudden, we were fighting the group at the front.
- 104 Q: Why were you fighting the group at the front?
- 105 A: Well, they were Peelers and were making smart comments about how we weren't getting
106 any pizza.
- 107 Q: How do you know they were Peelers?
- 108 A: If you know you know.
- 109 Q: Well, we don't all know.
- 110 A: You can just tell; they carry themselves differently than Slicers and we were in Peelers'
111 territory. So, I just knew they were Peelers.
- 112 Q: Alright, so what happened next?
- 113 A: Well, all of a sudden, we were fighting, I was getting pulled and punched. I ended up
114 having to pull out my knife to defend myself.
- 115 Q: Did you see anyone else with a knife?
- 116 A: I saw Jordan with something in their hand, I assumed it was a knife because every Slicer
117 carries one.
- 118 Q: Did you see Jordan do anything with the object?
- 119 A: No.
- 120 Q: Do you recognize this man? **[EXHIBIT A]**
- 121 A: Yeah, that's the guy Jordan was fighting.
- 122 Q: What happened after you saw Jordan fighting the guy?
- 123 A: They went spinning out the front door.
- 124 Q: What do you mean?
- 125 A: Well, they were holding each other by the shoulder and just like spun out the front door.

- 126 Q: What happened after that?
- 127 A: I don't know man; I was fighting the other guys.
- 128 Q: Were you hurt?
- 129 A: Yeah, I got some cuts and some bruises.
- 130 Q: Where do you think you got the cuts from?
- 131 A: I think one of those Peelers got me, the guys were saying they all had knives.
- 132 Q: Who told you that?
- 133 A: All of the guys, Chris said one came at him with a knife.
- 134 Q: Do you know if Jordan was hurt?
- 135 A: I think Jordan had a bruise or two, but they never really said.
- 136 Q: How did the fight end?
- 137 A: Someone yelled "Cops!" and we all ran, Jordan and I met up with the other guys. I don't
- 138 know where Chris went, cause Chris wasn't at the car when we left.
- 139 Q: Was that the only thing yelled during the altercation?
- 140 A: I mean there was so much going on, I can't say exactly what was said during the fight.
- 141 Q: Thank you. That's all I have.

142 **END OF GRAND JURY TESTIMONY**

143 **CERTIFICATION:** On this 26th day of April 2021, I certify, under penalty of perjury, that I

144 have carefully reviewed the above grand jury testimony to determine whether the answers

145 contained are true and correct, and whether I had any additional information relevant to the

146 matters therein. I hereby certify, under penalty of perjury, that the grand jury testimony is

147 accurate, and I have no information relevant to the matters discussed other than what is discussed

148 in this grand jury testimony. Everything was covered and nothing was left out.

149

150 *Ricky Dander*

151 Signed by Ricky Dander

**CLEMENTINE POLICE DEPARTMENT
GANG DIVISION**

PEOPLE V. JORDAN ARNOLD

**OFFICER CHRIS MANCHEGO INVESTIGATIVE REPORT
APRIL 1, 2021**

152 **SYNOPSIS:** Based on my investigation of the Slicers and the fight at Greece Pizza, I've
153 concluded that Jordan Arnold, "Arnold," was an active member in the Slicers and the initial
154 aggressor at Greece Pizza.

155
156 **PERSONAL HISTORY:** I obtained a bachelor's degree in Psychology and Criminology from
157 Southern Oregon University in 2006. After that I went into the police academy for the Oregon
158 State Police. After completing my rookie year, I decided I wanted to go into undercover work. I
159 worked at the Oregon State Police for 5 years before an undercover position was open. I then
160 started working as an undercover officer in the Human Trafficking Unit for the Oregon State
161 Police. In 2012, Clementine Police Department contacted me and wanted me to move to work
162 undercover for them at the end of my contract. In 2014, I moved to New Orange and started
163 working for Clementine Police Department in the Gang Division as an Undercover Police
164 Officer.

165
166 Since 2014, I have completed 5 undercover assignments in the Gang Division, looking at
167 numerous gangs including the Rowdy Boys, Marbury's Madisons, Ladies of the Night, Breakers,
168 and, finally, the Slicers. These 5 investigations have resulted in approximately 60 arrests and 22
169 convictions. I have testified in one other case.

170
171 **INVESTIGATIVE NARRATIVE:** In 2019, I was assigned to work as an undercover in the
172 Slicers, a local gang. We had a confidential informant that was able to get me in contact with one
173 of the recruiters. I used the alias Chris Hanley and met with the recruiter who walked me through
174 an intense initiation process. During the initiation process you are asked to do various activities
175 as well as learn how to present yourself as a member of the Slicers. One of the most important
176 things they teach you is that the phrase "let 'em slice!" means to get your knives out and stab
177 who you see.

178
179 Per Clementine Police Department policy, I will only be discussing my time with the Slicers as it
180 is related to Jordan Arnold and the stabbing at Greece Pizza.

181
182 In December 2020, Jordan Arnold started coming around the slicers. Jordan began the initiation
183 process and was getting integrated into the gang. On February 28, 2021, after an initiation event,
184 myself, Jordan Arnold, Ricky "Delight" Dander, and some other Slicers decided to go get pizza
185 at Greece Pizza. This was about 12:30am. Greece Pizza is across the County. In my experience,

186 when gangs want to go across the County, they are looking for trouble with the rival gang. Being
187 that Jordan wasn't initiated yet, this is why, I believe, Jordan suggested we go to Greece Pizza.
188

189 When we arrived, there was a group of four teenage boys order pizza at the counter. Our group
190 walked in with me and Jordan Arnold at the front. As we all walked in, the employee behind the
191 counter announced that the group of teenage boys were getting served the final slice of pizza.
192

193 This increased the tension that was already built because of being on the wrong side of the
194 County. At this point, one of the teenage boys, Nick Schmidt, said "We are getting the last of the
195 pizza, sorry guys." At this point, Jordan Arnold took out his knife and attacked Nick Schmidt.
196 When Arnold went after Schmidt, he yelled "let 'em slice!" This made the entire group ignite
197 and huge fight broke out. All of the slicers brought their knives out and the teenage boys began
198 to try to defend their friend.
199

200 I was not injured as I stayed back from the altercation and stood next to the pizza counter.
201 Eventually, Jordan Arnold and Nick Schmidt spun out the front door and all the other fighters
202 followed. After I was sure all the Slicers had left, I went to check on Nick Schmidt.
203

204 Nick Schmidt was lying on the sidewalk outside Greece Pizza. Nick Schmidt had a laceration
205 about 2-4 inches long right above his collarbone. He was bleeding pretty badly, I called 9-1-1 but
206 did not give my name as I was still undercover. I then left and went to meet up with the Slicers.
207

208 The next day, I informed the detective of everything that I saw. I identified Jordan Arnold as the
209 person who stabbed Nick Schmidt.
210

211 I believe this was Jordan Arnold's attempt at finishing their initiation into the Slicers and Nick
212 Schmidt was an innocent victim in this fight. I did not see Nick Schmidt with any weapon.
213 Jordan Arnold was completely unprovoked.
214

215 All of my opinions are stated within a reasonable degree of certainty in my field.
216

217 **CERTIFICATION:** On the 1st day of April 2021, I certify, under penalty of perjury, that I have
218 carefully reviewed the above report to determine whether the information contained is true and
219 correct, and whether I had any additional information relevant to the matters therein. I hereby
220 certify, under penalty of perjury, that the report is accurate, and I have no information relevant to
221 the matters discussed other than what is discussed in this investigative report. Everything was
222 covered and nothing was left out.
223

224 *Chris Manchego*

<p>THE PEOPLE OF THE STATE OF NEW ORANGE</p> <p style="text-align: center;">Prosecution,</p> <p style="text-align: center;">Vs.</p> <p>JORDAN ARNOLD</p> <p style="text-align: center;">Defendant.</p>	<p>No. 2021 – CV- 18962 – CR</p> <p>March 17, 2021</p>
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VOLUNTARY STATEMENT OF DALLAS ROSE

225 This statement is being voluntarily given, upon being duly sworn and subject to the threat of
 226 perjury by Dallas Rose, in the matter of THE PEOPLE OF THE STATE OF NEW ORANGE V.
 227 JORDAN ARNOLD Docket No. 2021 – CV – 18962 – CR.

228
 229 My name is Dallas Rose. I am the owner of Greece Pizza. I opened Greece Pizza in 2015. Greece
 230 Pizza has had a bad reputation because of being in the middle of “gang territory,” but I don’t buy
 231 into that. I run a good and honest business and do my best to keep everything peaceful in my
 232 shop.

233
 234 In January 2021, there was a string of armed robberies on the west side of Clementine County. I
 235 heard that the burrito place up the street had been robbed and knew that I would be next. I was
 236 getting cameras installed the next month so I could protect myself from any crimes. Before the
 237 cameras were installed, two people robbed me with knives. They came in, scared all my
 238 customers out of the shop and then stole all the money I had in my register. I studied their faces,
 239 even though they had bandanas covering them, while they were robbing me, and I never forget a
 240 face that wronged me.

241
 242 On February 28, 2021, I was serving a group of teens when I noticed a large group came in
 243 behind them. We were about to close, so I announced that I was serving the last pizza of the
 244 night already. I instantly recognized two of the guys in the group, Chris Hanley and Ricky
 245 Dander, as the two people who robbed me before. I also recognized my nephew/niece, Jordan
 246 Arnold. Jordan comes in late at night after working at a warehouse to get a slice of pizza before
 247 going home a couple nights a week. He has been coming to my shop about 3 times a week for
 248 the past 2 years. Jordan is a good kid who always says thank you and leaves a couple bucks in
 249 the tip jar. He has never caused any problems in my shop, and I cannot believe that Jordan would
 250 be involved in what happened on February 28, 2021. I truly believe he was just caught in the
 251 crossfire.

252
 253 After I announced that the last pizza was being served, I turned around to call the cops to come
 254 get the people that robbed me. I didn’t want to tip anyone off that I was calling, so I tried to look
 255 like I was serving the pizza, which was in the oven behind me. But the next thing I knew was

256 someone was yelling "let 'em slice!" I turned around and saw Chris with a knife. I saw Nick
257 Schmidt and Jordan fighting, but I don't know who started it. I was yelling for them to take it
258 outside when Nick started to throw Jordan out onto the sidewalk. I was really concerned for
259 Jordan and the other patrons. I don't know who dealt the first blow or started this fight.

260
261 After the smoke cleared, I went outside and saw Nick Schmidt lying on the ground bleeding. He
262 had some sort of cut near his shoulder and was bleeding pretty badly. I assumed that someone
263 had stabbed him. I called 9-1-1 and told them what happened, I don't even think I gave them my
264 name. The paramedics were there within about 5 minutes. When I went back in, I found a box
265 cutter on the ground and gave it to the police.

266
267 I know that my shop is in gang territory. I don't know what kids are in a gang and what kids are
268 not. I treat all people the same when they come into Greece Pizza. That's probably why, for the
269 most part, I have not had many problems at the shop. I do not know if any of the people in
270 Greece Pizza were a part of a gang or not.

271
272 **CERTIFICATION:** On this 17th Day of March 2021, I certify, under penalty of perjury, that I
273 have carefully reviewed the above voluntary statement to determine whether the information
274 contained is true and correct, and whether I had any additional information relevant to the
275 matters therein. I hereby certify, under penalty of perjury, that the voluntary statement is
276 accurate, and I have no information relevant to the matters discussed other than what is discussed
277 in this voluntary statement. Everything was covered and nothing was left out.

278
279 *Dallas Rose*

<p>THE PEOPLE OF THE STATE OF NEW ORANGE</p> <p style="text-align: center;">Prosecution,</p> <p style="text-align: center;">Vs.</p> <p>JORDAN ARNOLD</p> <p style="text-align: center;">Defendant.</p>	<p>No. 2021 – CV- 18962 – CR</p> <p>May 4, 2021</p>	
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VOLUNTARY STATEMENT OF JORDAN ARNOLD

280 This statement is being voluntarily given to Officer James Lemon, upon being duly sworn and
281 subject to the threat of perjury by Jordan Arnold, in the matter of THE PEOPLE OF THE
282 STATE OF NEW ORANGE V. JORDAN ARNOLD Docket No. 2021 – CV – 18962 – CR.
283

284 My name is Jordan Arnold. I currently reside at Clementine County Justice Correctional Facility.
285 I am not taking any medication that would impair my ability to testify or memory of what
286 happened regarding the fight at Greece Pizza. I was attacked and had to defend myself. I did not
287 know that we were in gang territory when Nick Schmidt attacked me. I have never heard of the
288 Slicers or the Peelers.
289

290 I met Chris Hanley and Ricky Dander in December 2020. Ricky and I hit it off right away, I
291 consider Ricky a friend. During that winter, Chris and Ricky would pick me up after being out
292 all night and we would go grab some food. I worked nights at the Amazon Warehouse as a
293 picker, so it was typically when I would be getting off of work. If Chris and Ricky were involved
294 in shady stuffy, it happened before or after I hung out with them.
295

296 Only once before did I get caught up in something with Chris and Ricky. In January 2021, Chris
297 and Ricky picked me up from the warehouse. We went to get burritos on the west side of
298 Clementine County and when we got in, Chris and Ricky started to rob the place. They took
299 knives out and were threatening the cashier. I was scared and so I pulled out a box cutter that I
300 always had for work. I played along but was really just trying to find a way out. The police
301 eventually came and arrested the three of us. I testified against Ricky on February 19, 2021 at a
302 Grand Jury, but he didn't even get charged for the robbery. Instead, he got charged under Rocco
303 or whatever it is called.
304

305 I thought that after I testified against Ricky, they would never want to talk to me again. But, on
306 February 28, 2021, Chris and Ricky asked to pick me up and wanted to grab a bite to eat. I
307 figured they wanted to just smooth things over. I normally get off of work at around 1:00am.
308 Instead, they totally set me up to take the fall for some attack they wanted to do.
309

310 Chris wanted to go to the pizza place on the west side called Greece Pizza. I normally go there
311 after work when I am not with Chris and Ricky, so I agreed. When we walked in, Chris was
312 standing next to me. There was a group of guys in front of us ordering pizza. My uncle/aunt was
313 actually behind the counter, they own Greece Pizza, and announced that they were serving the
314 last pizza to the guys in front of us.

315
316 One guy, I think his name is Nick Schmidt, turned to us and said “Ha! Losers, we got the last
317 pizza. Surprised they would even serve chumps like you.” Chris lost it after he said that to us. He
318 took out his knife and was yelling at the guys. Nick Schmidt then pulled a knife out and came
319 after me. I got my box cutter and tried to defend myself. I hit Nick with my box cutter. Chris was
320 in the tussle, and everything turned into chaos so quickly. All of a sudden, I was out the door and
321 running down the street to get away from the mess. I was arrested at my house the next day. I
322 have not talked to Chris or Ricky since.

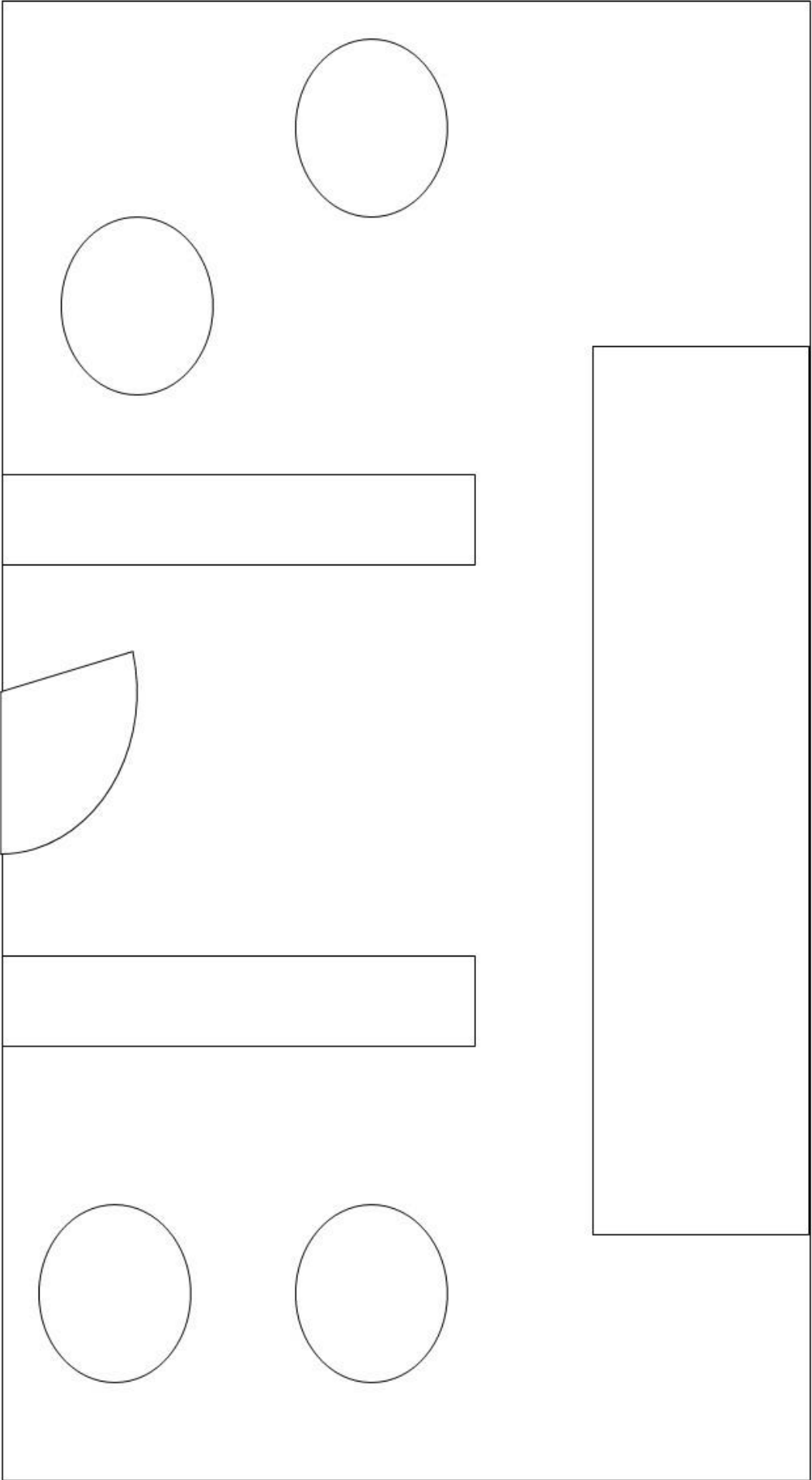
323
324 **CERTIFICATION:** On this 4th day of May 2021, I certify, under penalty of perjury, that I have
325 carefully reviewed the above voluntary statement to determine whether the information
326 contained is true and correct, and whether I had any additional information relevant to the
327 matters therein. I hereby certify, under penalty of perjury, that the voluntary statement is
328 accurate, and I have no information relevant to the matters discussed other than what is discussed
329 in this voluntary statement. Everything was covered and nothing was left out.

330
331 *Jordan Arnold*



**Exhibit
A**

F



**Exhibit
B**

**Clementine County Department of Justice
Criminal Records Division
Certification of Criminal Records**

Jordan Arnold

06/13/95

XXX-XX-0746

**THE FOLLOWING INFORMATION IS A CERTIFIED RECORD. THE RECORD HAS
BEEN KEPT IN THE NATURAL COURSE OF BUSINESS AND MAINTAINED BY
THE CRIMINAL RECORDS DIVISION IN ACCORDANCE WITH LOCAL AND
FEDERAL LAWS.**

Criminal History of Jordan Arnold, residing at 1717 Mandarin Avenue, Valencia, New Orange.

Convictions:

1. 03/15/15: Theft by Deception (M)

Disposition

6 mo. Imprisonment

Max Sentence

2 Years Imprisonment

Arrests:

1. 01/15/21: Armed Robbery (F)
2. 05/06/18: Disorderly Conduct (M)
3. 04/08/18: Disorderly Conduct (M)
4. 12/25/17: Retail Theft (M)

Max Sentence:

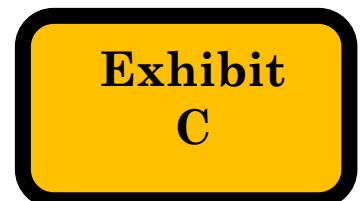
4 Years Imprisonment
3 Months Probation
3 Months Probation
6 Months Probation

The undersigned certifies that the above record is truthful, accurate, and complete. This is an authentic record of the Criminal Records Division of the Clementine County Department of Justice.

Kevin Eaton

Kevin Eaton

Director of Criminal Records



CLEMENTINE COUNTY DISPATCH OFFICE
FEBRUARY 28, 2021

THE FOLLOWING INFORMATION IS A CERTIFIED RECORD. THE RECORD HAS BEEN KEPT IN THE NATURAL COURSE OF BUSINESS AND MAINTAINED BY THE CLEMENTINE DISPATCH OFFICE IN ACCORDANCE WITH LOCAL AND FEDERAL LAWS.

Date: 4/28/21

Time: 0125

Dispatcher: RPG

Source: Phone

Caller: Anonymous

Category: Assault

Location: Greece Pizza, 7594 Pepperoni Ave

Information: Caller stated that someone was stabbed during a fight at Greece Pizza. Caller said there was a cut on victim's shoulder.

Result: Paramedics and police dispatched.

----- END OF CALL LOG -----

The undersigned certifies that the above record is truthful, accurate, and complete. This is an authentic record of the Clementine County Dispatch Office.

Eileen Bishop

Eileen Bishop

Chief Dispatcher



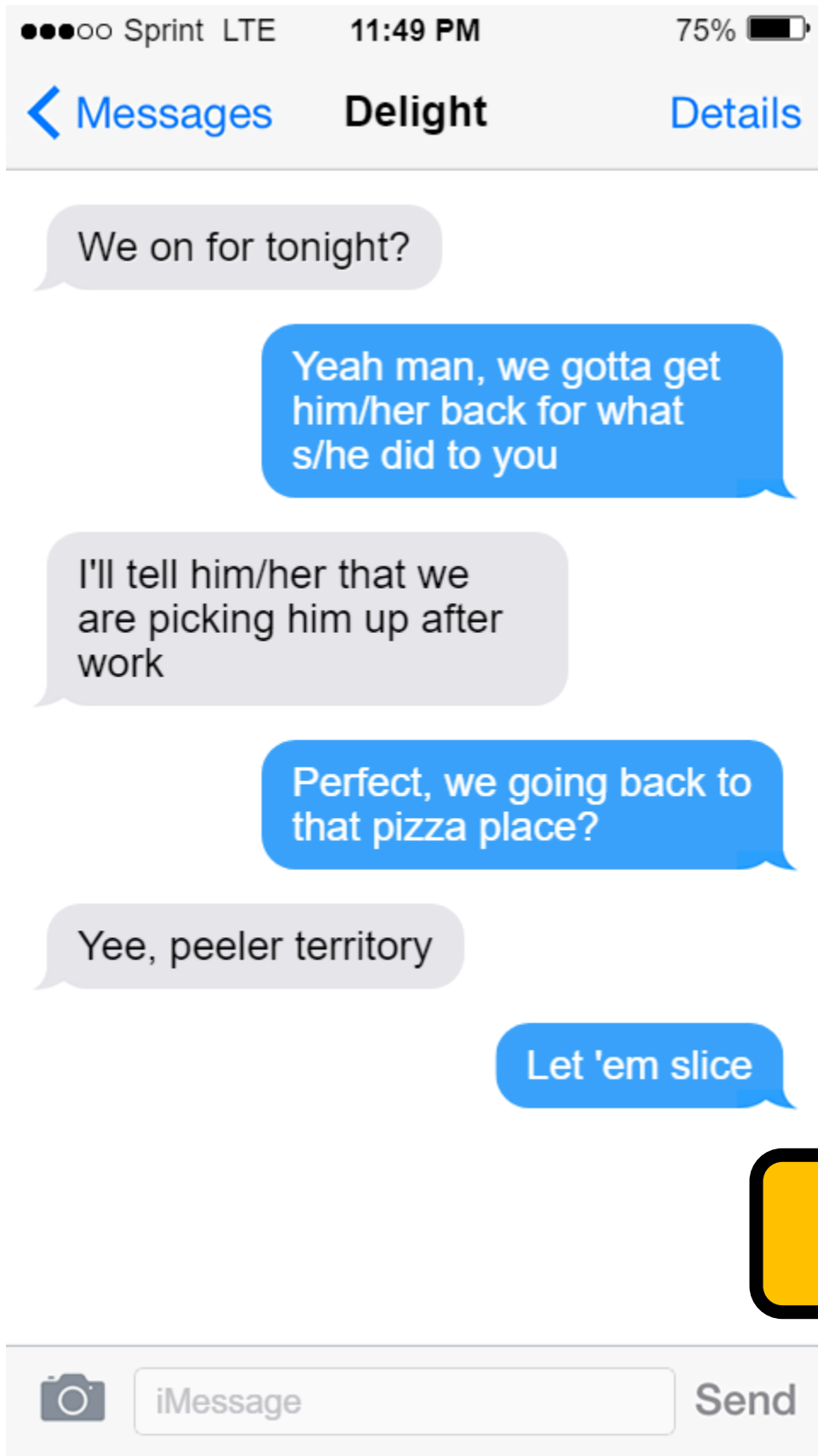


Exhibit
F



CLEMENTINE POLICE DEPARTMENT
INTERNAL AFFAIRS DIVISION

TO: Todd Tipps, Chief of Police

FROM: Danielle Harper, Internal Affairs Division Director

DATE: March 5, 2021

RE: Officer Chris Manchego

Dear Chief Todd Tipps:

This letter serves as official notification that one of your officers, Chris Manchego, is under investigation after an anonymous tip from a community member. The tip implicated Manchego in multiple crimes in connection with a group called the Slicers.

Internal Affairs understands that undercover officers in “gang” assignments will occasionally have to participate in criminal activity to keep authenticity with the “gang” they have infiltrated. However, this does not absolve officers in these assignments from any liability for their actions. There are numerous crimes that officers in these assignments may be held liable for including, but not limited to, theft, assault, homicide, and other felony charges.

Internal Affairs is also aware that undercover officers in long-term assignments may start to identify more closely with their alias. Meaning, we believe that Manchego has fully committed to the group they have infiltrated and has begun identifying as a member of the Slicers rather than as a member of the Clementine Police Department.

We have notified Officer Chris Manchego of this investigation and he has been put on Administrative Leave until our investigation is concluded.

Regards,

Danielle Harper
Internal Affairs Division Director

Exhibit
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JURY INSTRUCTIONS

COUNT ONE: 21 OPC § 17.02. ASSAULT IN THE SECOND DEGREE

The first count is Assault in the Second Degree. Under our law, a person is guilty of Assault in the Second Degree when, with intent to cause physical injury to another person, he or she causes such injury to that person by means of a deadly weapon or a dangerous instrument.

The following terms used in that definition have a special meaning:

“Physical injury” means impairment of physical condition or substantial pain

In order for you to find the defendant guilty of this crime, the People are required to prove, from all the evidence in the case, beyond a reasonable doubt, both of the following two elements:

1. That on or about February 28, 2021, in the County of Clementine, the defendant, Jordan Arnold, caused physical injury to Nick Schmidt by means of a deadly weapon or dangerous instrument; and
2. That the defendant did so with the intent to cause physical injury to Nick Schmidt.

If you find the People have proven beyond a reasonable doubt both of those elements, you must find the defendant guilty of this crime.

If you find the People have not proven beyond a reasonable doubt either one or both of those elements, you must find the defendant not guilty of this crime.

COUNT TWO: 21 OPC § 17.03. ASSAULT IN THE FIRST DEGREE

The second count is Assault in the First Degree. Under our law, a person is guilty of Assault in the First Degree when, with the intent to cause serious physical injury to another person, he or she causes such injury to that person.

The following terms used in that definition have a special meaning:

“Serious physical injury” means impairment of a person’s physical condition which creates a substantial risk of death, or which causes death or serious and protracted disfigurement, protracted impairment of health or protracted loss or impairment of the function of any bodily organ.

In order for you to find the defendant guilty of this crime, the People are required to prove, from all evidence in the case, beyond a reasonable doubt, both of the following two elements:

1. That on or about February 28, 2021, in the County of Clementine, the defendant, Jordan Arnold, caused serious physical injury to Nick Schmidt; and
2. That the defendant did so with the intent to cause serious physical injury to Nick Schmidt.

If you find the People have proven beyond a reasonable doubt both of those elements, you must find the defendant guilty of this crime.

If you find the People have not proven beyond a reasonable doubt either one or both of those elements, you must find the defendant not guilty of this crime.

JUSTIFICATION: USE OF PHYSICAL FORCE IN DEFENSE OF A PERSON

With respect to counts one and two, the defendant has raised the defense of justification, also known as self-defense. The defendant, however, is not required to prove that he was justified. The People are required to prove beyond a reasonable doubt that the defendant was not justified.

Under our law, a person may use physical force upon another individual when, and to the extent that, he/she reasonably believes it to be necessary to defend himself/herself from what he/she reasonably believes to be the use or imminent use of physical force by such individual.

The determination of whether a person REASONABLY BELIEVES physical force to be necessary to defend himself/herself from what he/she reasonably believes to be the use or imminent use of physical force by another individual requires the application of a two-part test.⁴ That test applies to this case in the following way:

First, the defendant must have actually believed that Nick Schmidt was using or was about to use physical force against him/her and that the defendant's own use of physical force was necessary to defend himself/herself from it; and

Second, a "reasonable person" in the defendant's position, knowing what the defendant knew and being in the same circumstances, would have had those same beliefs. It does not matter that the defendant was or may have been mistaken in his/her belief, provided that such belief was both honestly held and reasonable.

Notwithstanding the rules I have just explained, the defendant would not be justified in using physical force if he/she was the initial aggressor.

JURY VERDICT

CIRCLE ONLY ONE OF THE TWO OPTIONS FOR EACH COUNT

Count One: Assault in the Second Degree	GUILTY	NOT GUILTY
Count Two: Assault in the First Degree	GUILTY	NOT GUILTY