IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, Plaintiff, vs. DANUEL DEAN QUAINTANCE, MARY HELEN QUAINTANCE, and JOSEPH ALLEN BUTTS, Defendants.

NO. CR. 06-538 RB

GOVERNMENT'S NOTICE OF INTENTION TO OFFER EXPERT TESTIMONY

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The United States of America, by and through Larry Gomez, Acting United States Attorney for the District of New Mexico, and Luis A. Martinez, Assistant United States Attorney for said District, hereby provides notice that the United States intends to introduce expert testimony in evidence during its case-in-chief at trial. The United States provides this notice pursuant to Fed. R. Crim. P. 16 and the Court's discovery order and submits that this evidence is relevant to the issues to be tried before the jury in this case. The United States advises as follows:

1. The United States plans to call as witnesses Drug Enforcement Administration chemists Wisam Maroge and Fredericka M. Laux. It is anticipated that these chemists will testify about the tests performed on the substance seized in connection with this case and the determination that the substance was Marijuana, a controlled substance. Their testimony will include expert opinions and specialized knowledge. Mr. Maroge's and Ms. Laux's resumes and a summary of their anticipated testimony will be disclosed to the defendants.

2. The United States also intends to call Drug Enforcement Administration Special Agent Eric Hansen. Agent Hansen has served as a Drug Enforcement Administration agent for almost six years. Agent Hansen obtained a B.S. degree in Sociology with a certificate of Criminology from The University of Utah. Additionally, Agent Hansen worked as a Highway Patrolman in the State of Texas for eleven years. Agent Hansen has participated in approximately 300 drug-related investigations. These investigations have helped form the basis for his testimony and are part of the basis regarding his knowledge, skill, experience, training, and education.

3. During the course of his law enforcement career, Agent Hansen has undergone extensive formal and on-the-job training regarding narcotics trafficking. Additionally, Agent Hansen has participated in numerous undercover operations and approximately 200 debriefings/interviews with defendants, cooperating individuals, and other witnesses concerning narcotics trafficking, including Marijuana trafficking.

4. Agent Hansen will testify about the methods commonly used in interstate transportation of Marijuana and the value, both wholesale and retail, at different locations. He also may testify about the tools of the trade of narcotics traffickers. Agent Hansen will testify regarding the amounts of Marijuana typically consumed by a user of that drug, as opposed to amounts intended for distribution to others. Agent Hansen's testimony will include both specialized knowledge and expert opinion regarding these matters.

5. The above-described testimony will be offered to aid the jury in determining the issues of the case.

Respectfully submitted,

LARRY GOMEZ Acting United States Attorney

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I hereby certify that this notice was delivered to defense counsel of record, Jerry Daniel Herrera, John Robbenhaar and Bernadette Sedillo, this 24th day of May, 2007.

/s/ LUIS A. MARTINEZ Assistant U.S. Attorney

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