

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CRIMINAL NO. 06-538 JCH
	)	
<b>DANUEL DEAN QUAINANCE and</b>	)	
<b>MARY HELEN QUAINANCE,</b>	)	
	)	
Defendants.	)	

GOVERNMENT'S NOTICE OF INTENTION  
TO OFFER EXPERT TESTIMONY

The United States of America, pursuant to Fed. R. Crim. P. 16 and the Court's discovery order, hereby provides notice that the government intends to introduce expert testimony in evidence during its case-in-chief at trial, 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 intends to call Drug Enforcement Administration ("DEA") chemists Fredericka M. Laux and Wisam Maroge as witnesses. It is anticipated that these chemists will testify about the tests performed on the substance seized in connection with this case and that they each determined that the substance/samples they separately tested was Marijuana, a controlled substance. Their testimony will include expert opinions and specialized knowledge. Each chemist's resumé will be disclosed to the defendants.

2. The United States also intends to call Drug Enforcement Administration Special Agent Eric Hansen. Although the United States does not believe that testimony by law enforcement officers based on experience in that capacity constitutes expert testimony, pursuant to Fed. R. Evid. 702, such anticipated testimony has been identified below in the event it is determined that such testimony does fall within the purview, or Rule 702.

3. Agent Hansen has served as a DEA agent for approximately seven years. Agent Hansen obtained a B.S. degree in Sociology with a certificate of Criminology from University of Utah 1988. Agent Hansen spent 18 weeks at the Texas Department of Public Safety in Austin, Texas, in 1988. Additionally, Agent Hansen worked as a Texas Highway Patrol Trooper for eleven years. Subsequently, in 2000, Agent Hansen was enrolled at the DEA Academy in Quantico, Virginia, where he underwent instruction for, among other topics, the structure of drug organizations. During his seven years as a DEA Agent, Agent Hansen has participated in approximately 300 drug-related investigations. These investigations have helped form the foundation for his testimony and are part of the basis of his knowledge, skill, experience, training, and education.

4. 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.

5. 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. He will also offer testimony 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.

6. Agent Hansen has been qualified as an expert witness in Federal Court on approximately ten prior occasions.

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

Respectfully submitted,

GREGORY J. FOURATT  
United States Attorney

**Electronically filed by**  
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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to opposing counsel of record, on this date.

**Electronically filed**  
LUIS A. MARTINEZ  
Assistant United States Attorney

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