

# People v. Jackson Daniels: The shooting of Riverside Police Officers Dennis Doty and Phillip Trust

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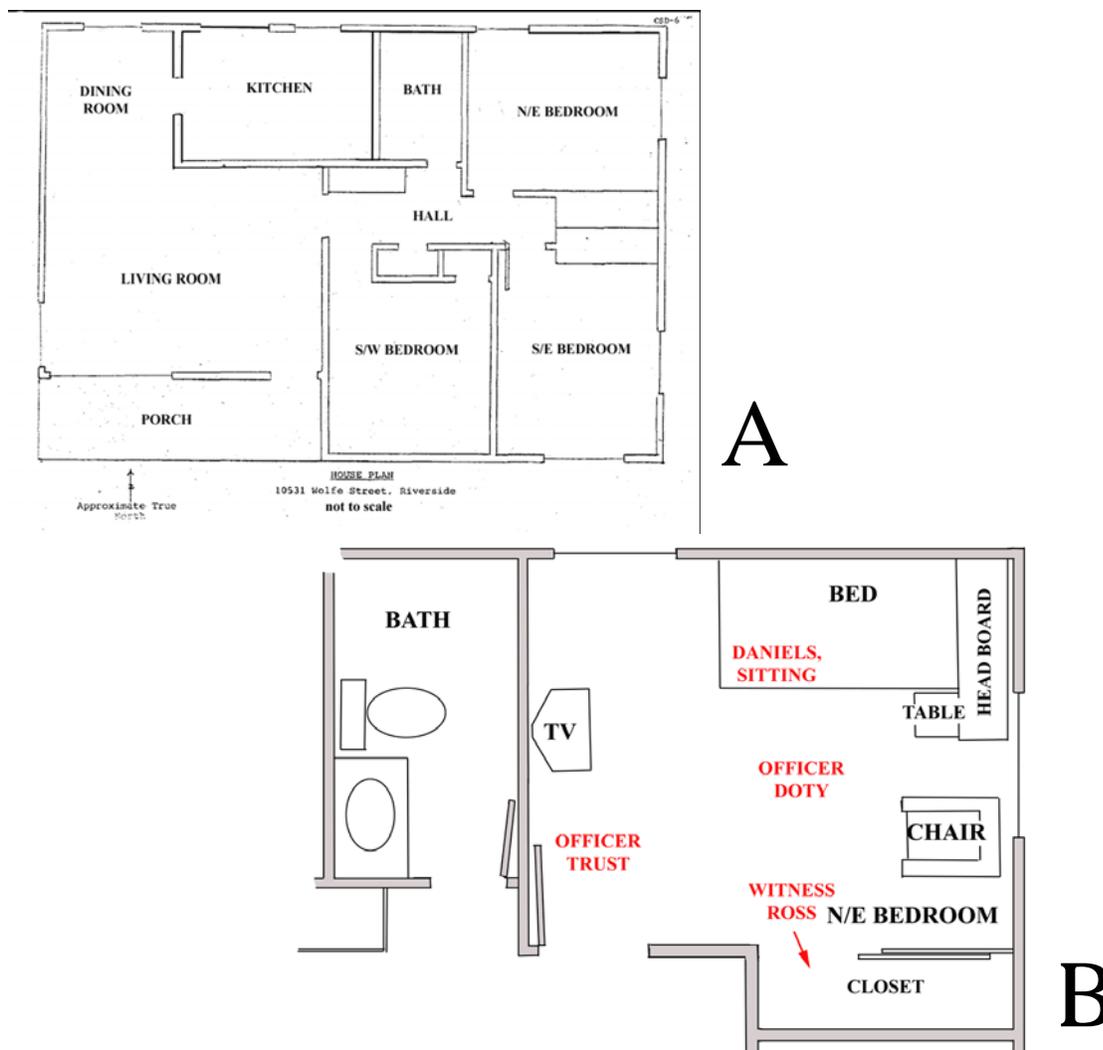
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## **Abstract**

Officers Dennis Doty and Phillip Trust entered a residence in Riverside, California to arrest Jackson Daniels, a wheel chair-confined felon. Upon entering the house, both Doty and Trust were involved in an exchange of gunfire with Daniels. Fifteen shots were fired with three .38 revolvers. Officer Doty lost his life within seconds of the start of the shooting. But the wounded Officer Trust interacted with his assailant and the crime scene for a number of minutes after the death of Officer Doty. The interaction between Daniels and Trust during these minutes created a complex crime scene which due to an error in the prosecution's reconstruction (selection the wrong wound as the first suffered by Trust) left the interpretation of the scene confused.

Selection of the correct first wound for Trust and an understanding of the consequence of that wound allow for the presentation of a scenario that connects most features of the entire crime scene. The results of this analysis make it clear that Jackson Daniels was relentless in his quest to kill Trust and he took a thoughtful and patient approach to achieve that goal.



**Figure 1.** (A) The layout of the house in which the shooting of Officers Doty and Trust took place. (B) Drawing of the N/E bedroom with the probable positions of the officers, Daniels and witness Ross just prior to the shooting; Daniels was sitting near the end of his bed. Ross was either searching for Daniels' shoes or had just recovered them and was turning around when Daniels produced his .38 revolver and started shooting. Ross, upon the start of the shooting, hid in the closet with the door closed until the shooting stopped and was called out by Daniels.

## Introduction

On May 13, 1982, at 0900, Officers Dennis Doty and Phillip Trust entered paraplegic Jackson Daniels' home in Riverside California to arrest him. Daniels became a paraplegic when he was shot during the commission of a robbery. The officers were admitted to the Daniels' home by Renee Ross, who was also a resident of the house. Ross led the officers to Daniels' bedroom (the northeast (N/E) bedroom, Fig. 1).

Daniels was dressed only in a shirt. Ms. Ross started gathering clothing to dress Daniels while

the officers were observing. Daniels requested Ross find shoes from his closet. As Ross was facing into the closet or perhaps turning toward the officers with the shoes, Daniels produced a .38 revolver and started shooting. In this initial volley, Doty received four bullets and Trust one. Both Doty and Trust managed to draw their .38 revolvers. The positions of the individuals at the beginning of the shooting in the N/E bedroom are shown in Fig. 1B. Renee Ross, within seconds of the start of the shooting, went into the closet and closed the door.

Officer Doty appeared not to have significantly changed his position in the room other than rotating and falling from his standing position. He died in the initial volley of bullets from Daniels. After Officer Trust's wounding in the N/E bedroom, much of the crime scene involving him was left unexplained. Indeed, in the retrial of Daniels (December 2009), the criminalist who participated in the original crime scene evidence collection and evaluation in 1982 testified on behalf of the prosecution. Noteworthy in his testimony is the lack of explanation for the many features of the crime scene in the southeast (S/E) bedroom that involved Officer Trust.

It is to the benefit of a jury or judge to be aware not only of the facts of a case but also their meaning in the context of a reconstruction, without which a miscarriage of justice can occur. It is unconscionable in a crime scene analysis, especially one as complex as this one, not to present a scenario that explains and connects the features of the scene. All the data need to be considered. The key error in this case was the decision that the perforating arm wound in Officer Trust was the first of his six bullet wounds. The second error was not to test other scenarios (e.g., the perforating back wound of Trust was the first). The arm wound explains neither the bloodstain evidence nor the behavior of Officer Trust in the S/E bedroom.

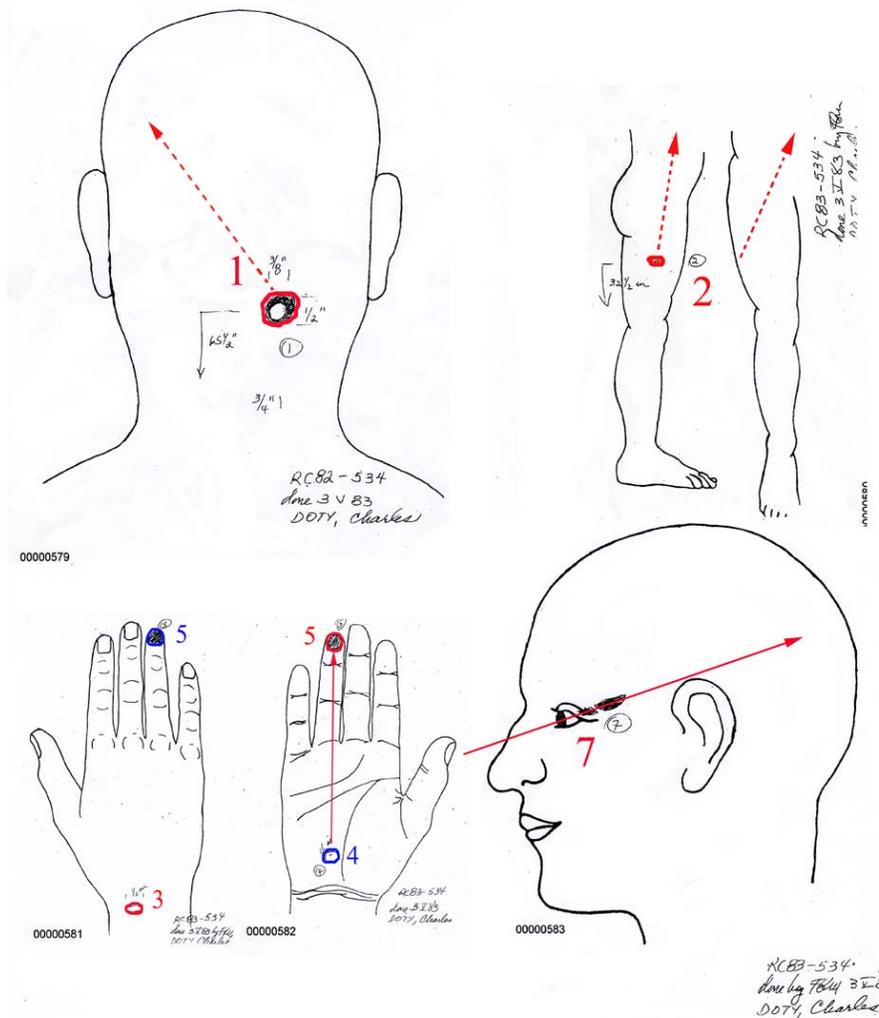
The crime scene includes Daniel's N/E bedroom and the adjoining, southeast (S/E) bedroom (Fig. 1A), where Officer Trust fled and ultimately died after being wounded five more times by Daniels.

### **Dennis Doty Autopsy**

Officer Doty received four shots from Daniels' revolver. Two of the bullets remained in his body. The Coroner's report is summarized in Fig. 2.

*Bullet 1, wound 1, penetrating (Fig. 2, upper left).* "The autopsy findings are interpreted as a death resulting from injuries to the brain produced by a bullet passing through the brain and additionally causing brain hemorrhages and skull fractures. The fatal bullet entered in the right medial occipital area and after passing through the skull its course in the brain was forward, to the left and upward. This bullet fragmented into three major pieces and these were recovered in association with the left parietal area of the brain."

*Bullet 2, wounds 3-5, perforating (Fig. 2, lower left).* "The bullet causing the three injuries entered the back of the right wrist, passed through the hand to exit in the hypothenar area then passed through the tip of the fourth finger. It entered the pad of the fourth finger and exited nail-side."



| Bullet | Entrance Wound | Exit Wound | Bullet Recovered from Body? | Bullet Origin & Item # |
|--------|----------------|------------|-----------------------------|------------------------|
| 1.     | 1              | -          | YES, FRAGMENTED             | DANIELS .38, A-29      |
| 2.     | 2              | -          | YES                         | DANIELS .38, A-32      |
| 3.     | 3,(5)          | 4,(5)      | NO                          | DANIELS .38, 44        |
| 4.     | 7              | -          | NO - GRAZING                | DANIELS .38, -         |

**Figure 2. (Top)** The wounds received by Officer Doty. The fatal wound was to the back of the head (upper left) and was the final shot into Doty. Wound 2 (upper right), was likely the second bullet received from Daniels where Doty had crouched and was turning counterclockwise. The third bullet to Doty struck the right hand (Lower left at 3), missing the revolver handle, which Doty likely had in his hand, followed by striking finger 4. Wound 7, lower right, was likely the first bullet to hit Doty and was not recovered. Entrance wounds are indicated in red; exit in blue. Solid arrow, either connects wounds created by the same bullet or shows bullet trajectory (lower right); dashed arrow shows the approximate internal track of the bullet. **(Bottom)** Summary of the bullet wounds from the autopsy report on Officer Doty. Bullet 1 was the fatal bullet. Bullet 2 entered the upper thigh and went in an upward direction into the abdomen. Bullet 3 (right hand) was recovered from the living room (item 44). Bullet 4 grazed the left side of the head, arrow shows the probable trajectory of the bullet.

*Bullet 3, wound 2, penetrating (Fig. 2, upper right).* “The wound identified as no. 2 ... is the entrance for a bullet that passed upward into the abdominal cavity and across the midline and came to rest in the mesentery.”

*Bullet 4, wound 7, grazing (Fig 2, lower right).* “At the time of the autopsy, it was suggested that a bullet may have grazed the left side of the face producing the band-like abrasion in the skin in the lateral aspect of the left eye.”

Although x-rays were relied upon during the autopsy of Doty, they were not supplied in the discovery for the 2009 retrial of Daniels.

### **Phillip Trust Autopsy**

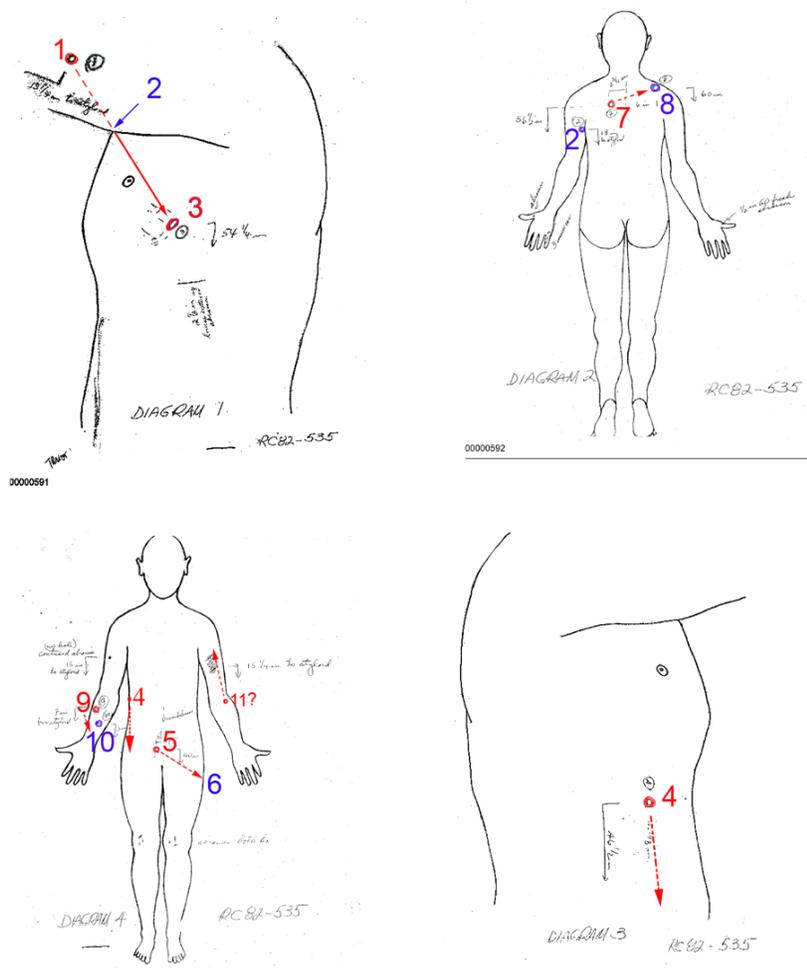
Officer Trust received six shots from Daniels’ and Doty’s revolvers. Four of the bullets remained in him. The Coroner’s report is summarized in Fig. 3.

*Bullet 1, wounds 1, 2 and 3, penetrating (Fig. 3, top left).* “The autopsy findings are of a death due to injuries to the intercostal blood vessels associated with the sixth left rib at the perforation fracture site, laceration of the left ling, multiple lacerations of the spleen and lacerations of the left kidney caused by a bullet passing in the body so as to produce the mentioned injuries. The fatal bullet first struck the body in the lateral aspect of the left arm producing the perforating wound described as item 1 ... passing through the posterior substance of the left arm exiting on the posteromedial aspect of the left arm producing the wound described as item 2..., then passing into the chest producing the wound described as item 3 ..., then passing so as to fracture the sixth rib and enter the left pleural cavity, then lacerating the left lung, then perforating the left leaf of the diaphragm, then extensively lacerating the spleen, then passing into the left psoas muscle group where it came to rest...”

*Bullet 2, wound 4, penetrating (Fig. 3, lower right).* “The wound described as wound 4 ... entered the body just below the rib cage, avoided perforating any of the bowel and then passed through the psoas muscle group on the right side to become buried in the right sacroiliac region. This bullet was completely buried in bone. It passed through the abdominal wall without actually perforating any of the bone.”

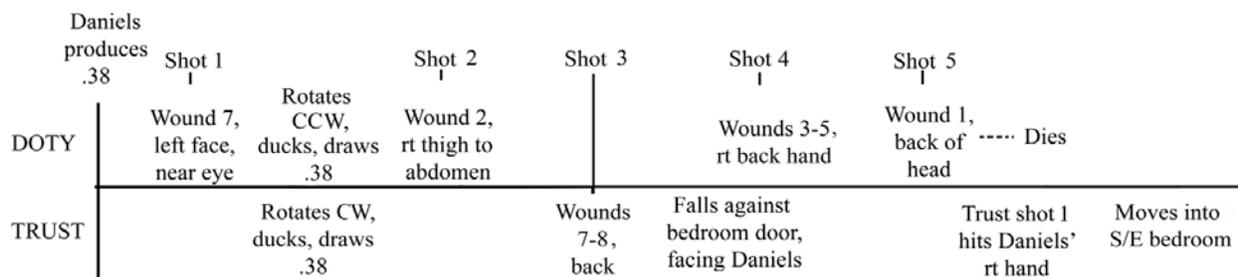
*Bullet 3, wounds 5 and 6, perforating (Fig. 3, bottom left).* The wound described as item 5 ... is the entrance for a bullet that stayed entirely in soft tissue and did not enter the abdominal cavity but rather passed toward the left downward and slightly backward to exit the left thigh making the wound described as item 6...”

*Bullet 4, wounds 7 and 8, perforating (Fig. 3, top right).* “The perforating wound described as item 7 ... represents the entrance of still another bullet that passed subcutaneously to exit in the upper right shoulder area causing the wound described as wound 8...” “The skin on a straight line between wounds identified as item 7 and item 8... was incised and the depth was demonstrated a connecting line of hemorrhage between the two wounds.”



| Bullet | Entrance Wound | Exit Wound | Bullet Recovered from Body? | Bullet Origin & Item # |
|--------|----------------|------------|-----------------------------|------------------------|
| 1.     | 1 and 3        | 2          | YES                         | DOTY .38, A-34         |
| 2.     | 4              |            | YES                         | DOTY .38, A-36         |
| 3.     | 5              | 6          | NO, IN PANTS                | DOTY .38, A-23         |
| 4.     | 7              | 8          | NO                          | DANIELS .38, 60        |
| 5.     | 9              | 10         | NO                          | DOTY .38, 141          |
| 6.     | 11             |            | YES, FRAGMENTED             | DOTY .38, A-35         |

**Figure 3. (Top)** Drawings made during the autopsy of Officer Trust. Bullet 1, wound 2 exits the left arm and enters the torso at wound 3 (upper left drawing). Bullet 4, wounds 7 - 8 (upper right drawing) was likely from Daniels' .38. Bullet 3, wounds 5 - 6, lower left, exit wound 6 (posterior upper thigh) is not shown. Bullet 6, wound 11 (left lower, at 11?) was not shown in the autopsy drawings nor could an autopsy image of it be found. The location is surmised from the autopsy description. Entrance wounds are indicated in red; exit in blue. Solid arrow connects wounds created by the same bullet; dashed arrows are the approximate internal track of the respective bullets. **(Bottom)** Summary of the bullet wounds from the autopsy. Bullet 1 was the fatal bullet. The bullet entered the upper right arm, exited at 2 and reentered the chest at 3. Bullet numbers 4 and 5 are perforating. Bullet 4 (upper back, Fig. 4, upper right) likely was from Daniels .38 (item 60) and bullet 5 (right arm wound) which was recovered from the S/E bedroom wall (item 141) was from Doty's .38.



**Figure 4.** Reconstruction of the timeline of the shots by Daniels at Officers Doty and Trust in the N/E bedroom.

*Bullet 5, wounds 9 and 10, perforating (Fig.3, lower left).* “The wound described as item 9 ... is the entrance for a bullet that passed through the soft tissue exiting the right forearm causing the wound described as item 10...”

*Bullet 6, wound 11, penetrating (Fig. 3, lower left at 11).* “The wound described as item 11... is the entrance wound of the bullet that fractured the distal part of the left radius and came to rest as three major fragments in the soft tissues of the upper part of the forearm.”

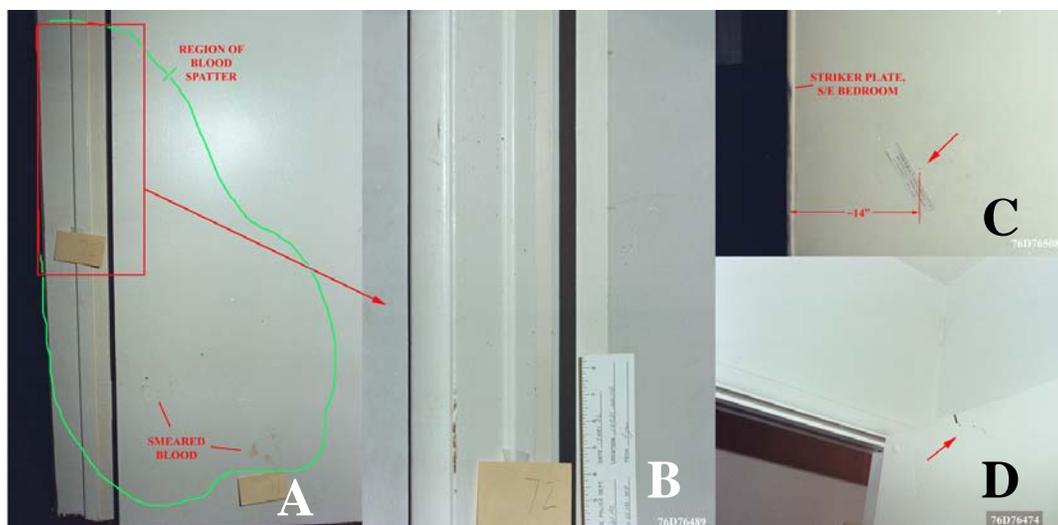
X-rays were also noted as being taken in the autopsy report, but were not available for review in this report.

## Crime Scene Reconstruction

This reconstruction is based on the materials provided to the defense for the 2009 retrial of Mr. Jackson Daniels: the police and crime scene reports, crime scene and autopsy photographs, crime scene drawings, autopsy reports, transcripts of witness interviews and prosecution testimonies of December 2009. The reconstruction differs from the presentation by the prosecution for the trial 2009 and likely for the 1983 trial.

**The N/E bedroom: The first shots.** Daniels had hidden his .38 revolver near him prior to the entry of the officers into his bedroom. The positions of the four persons in the bedroom at the time of the start of the shooting are shown in Fig. 1B.

The reconstruction of this part of the crime scene is presented through a timeline (Fig. 4). It appears that both Doty and Trust were distracted when Daniels produced his .38 revolver. Daniels first shot at Doty’s head. The bullet grazed Doty’s left face (Fig. 2, lower right) and apparently entered the interior of the closet (the door was open with this first shot). Renee Ross entered the closet after this shot and closed the closet’s door. When the shooting ended, Ross emerged from the closet and closed its door. The closet door appears to have remained closed throughout most of the crime scene evidence collection. Only one photograph was produced of a sliding-door closet’s contents, but this photograph was likely of the closet contents of the S/E bedroom. Even if this photograph was of the N/E bedroom, it did not include the upper part of the closet where this bullet likely hit. It is probable that the bullet that created Doty’s wound 7 (bullet 4) struck within the closet and was not collected.



**Figure 5.** The evidence associated with the back shot to Officer Trust. (A) High velocity impact spatter region on the door is outlined in green. Smearing of the spatter occurred in the lower part of this blood spatter region. The rectangular area outlined in red is enlarged in B. (B) Region of the door and frame showing a small blood transfer on the molding as well as high velocity impact spatter. (C) bullet impact (arrow) on the hall wall opposite the doorway to the N/E bedroom. This bullet, item 60, came to rest on the bathroom floor. The impact is ~ 14 inches from the S/E door casing and ~ 8 inches below the bottom of the door latch striker plate. (D) Evidence of the door had been broken (arrow) due to excessive pressure against it.



**Figure 6.** (A) Autopsy image of Doty's right hand showing the trajectory rod in place. Daniels was shooting downward from his position on the bed for this shot and Doty likely had his revolver loosely held in his hand. The stiffness of the fingers indicate Doty was still in rigor when this image was taken. (B) The bullet which hit Doty's hand went through the carpet, (arrow 1), hit the hardwood floor (arrow 2) and hit the wall (arrow 3). (C) The bullet strike on the wall from the bullet which went through Doty's hand.

At first sight of Daniels revolver and it's discharge at Doty's head, both officers started to duck and rotate - Doty counterclockwise and Trust clockwise. When Doty received the second shot in his thigh (bullet entered his abdominal cavity, Fig. 2, upper right), he was ducking and had partially completed his rotation. Doty had his revolver in his hand prior to this shot and he likely held onto it while falling to the floor with his back to Daniels.

Daniels turned his attention to Officer Trust and his third shot hit the ducking Trust in his upper back (Fig.3, upper right - at 7 to 8). The blood spatter on the bedroom door (Figs. 5A and 5B), the bullet deflecting off the hall wall (Fig. 5C) and ending up in the adjoining bathroom (Fig. 1A), place Trust near the N/E bedroom door (Fig. 1B) when he received this bullet. Following this wound, Trust fell back against the door (door broken, Fig. 5D) and smeared some of the blood spatter on the door (Fig. 5A). Trust may have fired at this time one shot from his revolver which hit the wall near the ceiling west of the north window, although it is more likely he later fired this shot at Daniels from a position near the door of the S/E bedroom.

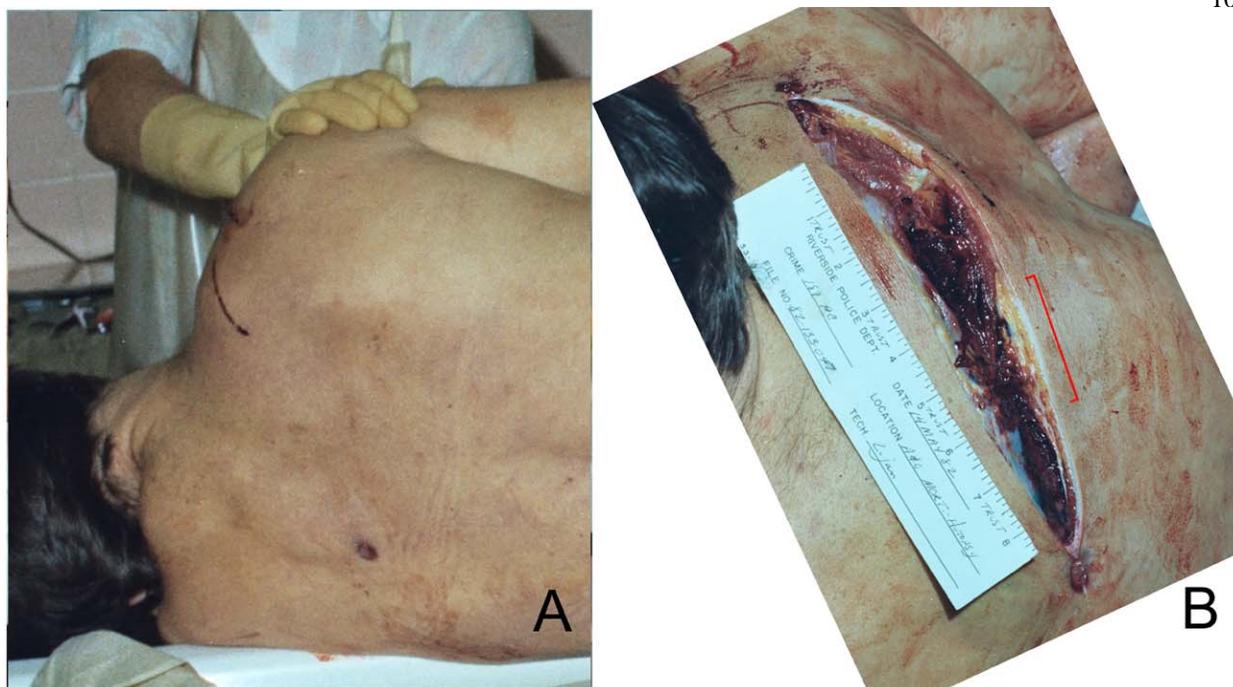
The fourth bullet from Daniels' revolver hit Doty's right rear wrist, traveled forward, through the palm and then perforated the tip of finger four (Fig. 2, lower left). Doty was in a crawl position with his revolver loosely held in his hand. The autopsy image of his hand with the trajectory rod (Fig. 6A) indicates if he was gripping his revolver, the bullet missed the handle. But, he could have dropped the revolver prior to this wound. After striking Doty's hand, the bullet hit the carpet and hardwood floor and hit low on the south wall (Fig. 6B). The hand was on or near the floor when the bullet hit. When this bullet hit the wall, it had little remaining momentum to make much of an impression (Fig. 6C) and inexplicably ended up on the carpet near the west wall in the living room.

The fifth and final bullet from Daniels' revolver struck Doty in the back of his head (Fig. 2, upper left) which was identified as the fatal bullet. Doty was on his hands and knees and facing the south wall. Upon receiving this wound, Doty fully collapsed with his head almost touching the south wall (Fig. 7).

Immediately following Daniel's final shot, Trust fired at Daniels from his position on the floor



**Figure 7.** The body of Doty at the crime scene in the N/E bedroom. His head is touching or almost touching the south wall of the N/E bedroom.



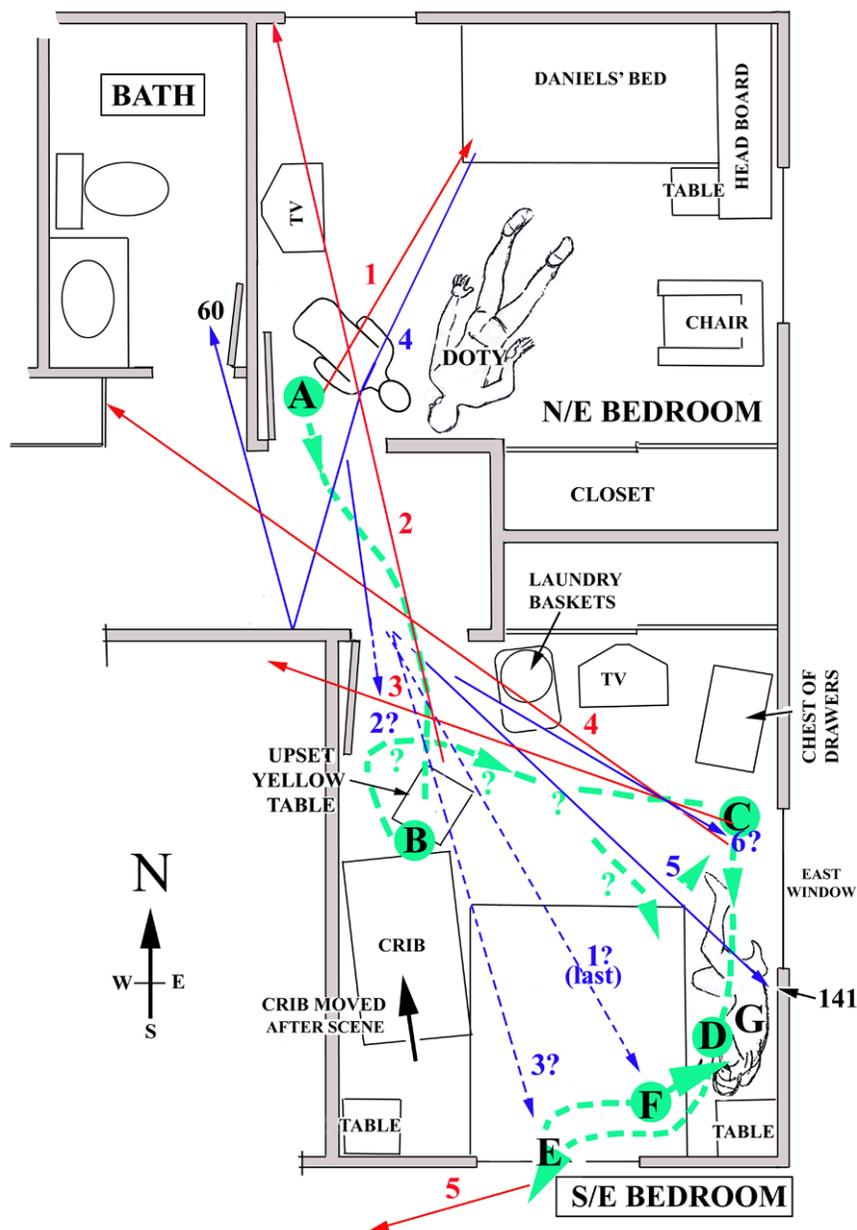
**Figure 8.** Bullet 4, wound 7-8 through the back of Officer Trust. (A) The autopsy report claims the bullet had “passed subcutaneously,” but the lack of bruising indicates it penetrated much deeper and likely interacted with the thoracic vertebrae 4 and 5. (B) Dissected bullet track revealed hemorrhaging and likely bone interaction of the bullet (at brackets). Although it is unlikely the spinal cord was directly damaged, the shock of the passing bullet probably caused partial leg paralysis of Officer Trust.

with his back on the bedroom door facing Daniels. The bullet hit Daniels’ right hand causing him to drop his empty revolver. Trust then left the N/E bedroom and entered the S/E bedroom.

A transcribed interview account from Theodor Smith, a friend of Daniels, supports this part of the reconstruction. Daniels admitted to Smith that he had emptied his revolver prior to his hand being shot by Trust. Daniels, despite being shot in his right hand, was obviously still able to use his hand.

**The nature of Trust’s back wound and its behavioral effect.** The bullet fired by Daniels at Trust penetrated the left posterior thoracic musculature adjacent to the medial border of the left scapula at the level of T4-T5 and exited through the right shoulder region approximating the upper border of the trapezius muscle. There were no contusions observed on external examination to indicate the bullet’s path (Fig. 8A). Since the thoracic vertebrae are in the direct path of this bullet and their posterior spinous processes are in direct contact with the dermis with no intervening subcutaneous tissue to conceal bleeding, the bullet’s trajectory had to have penetrated deep enough to strike the posterior elements of T4-T5 at the level of the transverse process or posterior lamina. The bullet’s interaction with the thoracic vertebrae caused it to veer slightly posterior and then exit the right shoulder area. If the bullet struck the left thoracic vertebra anterior to the transverse process, its trajectory would have been either through the spinal canal or even more anterior and into the vertebral body. In this scenario, the bullet could not have exited the shoulder.

Figure 8B illustrates the dissected bullet tract. The margins of the mid-third of the tract seem to



**Figure 9.** A scaled reconstruction of the crime scene involving Officer Trust; the solid blue arrows are the probable trajectories of the shots from Daniels revolver and Doty's .38 revolver fired while in Daniels' possession; the dashed blue arrows are uncertain trajectories. The blue numbers associated with the blue arrow refer to the bullets that wounded Trust (Fig. 3), most of which uncertain (as shown by "?"). Trust's bullet 2 (at blue "2?") might have been received while he was behind the yellow plastic table. The red arrows are the horizontal bullet trajectories shot from Trust's revolver; the associated red numbers reflect the order of these shots. Trust's shot 2 could have come from near the doorway of the S/E bedroom, as shown. The green arrow heads indicate Trust's direction of movement; the green dots are where he stopped and are designated with a scene letter. Each scene is discussed in the text. Trust's final position (G) is on the east side of the bed shown by the line drawing of his body. The crib was moved toward the bedroom door by an officer on the scene following the shooting.

be more irregular than on either end. This could have resulted from shattered bone fragments as a result of the bullet contacting and fracturing the posterior bony elements.

An acute injury to the thoracic spinal cord could not have been avoided in the path of this bullet. Anything from a spinal cord concussion, contusion or even severing the spinal cord would have occurred. The subject would immediately collapse and depending on the extent of spinal cord injury would have suffered varying degrees of incapacitation. The victim was able to crawl from the doorway of the northeast bedroom where he was shot, through the hallway and into the southeast bedroom. This indicates that Officer Trust's spinal cord was not completely severed. However, the evidence from the S/E bedroom shows that he was unable to stand and he would have been incapable of fleeing to safety.

After an acute spinal cord injury (SCI) improvement may or may not occur and is dependant on a variety of factors, not the least being the severity of the injury. However, reversal of paralysis does not occur in minutes. If there is to be any improvement, it takes hours to days to occur (Ling, 2007). Quite often, secondary injurious effects take place after the initial trauma resulting from continued bleeding and swelling within the spinal canal, as well as a host of a cellular toxic factors (Ling, 2007).

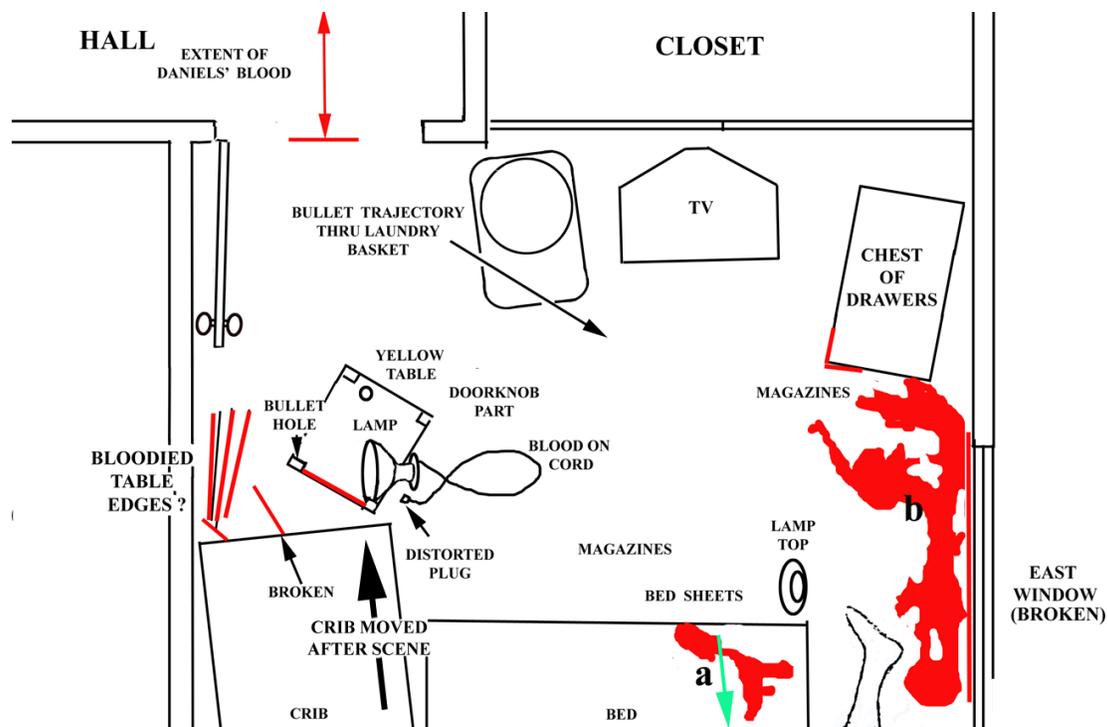
Perhaps the least understandable aspect of this crime scene is why Trust did not remain in the N/E bedroom and either kill Daniels or at least hold him until other officers were summoned. At the shooting of Daniels' right hand, Trust was apparently unaware that Daniels had fired all the cartridges in his .38 revolver and also his shot had disarmed Daniels. Trust's back wound had affected both his legs and likely his judgment at this time.

Paraplegic Daniels crawled to Doty's body and picked up Doty's revolver. He proceeded to the N/E bedroom door where he shot from within the N/E bedroom one time at Trust, who was near the door in the S/E bedroom.

***The S/E bedroom.*** The crime scene in the S/E bedroom follows the shooting in the N/E bedroom. This lasted a number of minutes after Trust entered this room. The activities of Trust and Daniels are broken down into scenes A through G (Fig. 9). Scene A, which occurred in the N/E bedroom, was previously discussed.

As noted, the evidence indicates Officer Trust's legs were at least partially paralyzed as a result of the back wound he received in the N/E bedroom. Scenes B through G in the S/E bedroom (Fig. 9) are interpreted with Trust having impaired leg control. He was staggering, falling and dragging his lower body with his arms and hands. Because of his likely need to use his arms hands to move, Trust had his revolver in his right hand and was not in a position to defend himself during the time of his movements. Daniels appears to have taken advantage of this vulnerability.

The trajectories of the shots fired by Daniels (Fig. 9), as indicated by the blue arrows and numbers (refers to the wound number of Trust, Fig. 3), are mostly uncertain. Trust's position at any one time is also uncertain. However, it is certain that Trust's location when he received bullet 5 (Fig. 3, wounds 9-10) is as indicated in Fig. 9, near the northeast corner of the bed



**Figure 10.** Scenes B and C; north portion of the S/E bedroom. The blood stains (shown in red) on the dark brown carpet are estimated. The green arrow is the direction of smearing for the blood stain on the bed. The yellow table is a key feature of the west part of the room. A glass lamp was on top of the table and was likely plugged into a receptacle on the west wall. Prior to the Table being upset, Daniels had fired a bullet through a leg of the table (Fig. 11B) which hit Trust (bullet 2, wound 4?). The central area of this part of the room showed some blood drips on the magazines. The dark brown carpet concealed blood evidence. Blood on the east corner of the bed (at a) indicates that Trust had at some point moved across in the direction of the head of the bed (green arrow). A major blood stain at b (C in Fig. 9) indicates that Trust had stayed at this position and received a bullet with the laundry basket as an intermediate target. Trust also fired two times from this position.



**Figure 11.** Scene B; entry way into the S/E bedroom. (A) The broken crib. (B) Apparent blood lines left by the upside down table edge; Trust was in a position bleeding onto this surface and then the table was moved a number of times leaving the blood “lines” (at arrow heads). It is apparent that the crib was moved north over some of these blood transfers. A strip of molding from the crib is in the foreground of the image. (C) The plastic table that was upset by trust falling on it. The lamp likely had been on top of the table. The round piece of metal is from the knob of the bedroom door. It does not appear from the crime scene images that there was a privacy lock on the knob.

when he received this bullet. In addition, bullet 1 was fatal and he received it near the position where he was found. The other Trust wounds will be discussed as to his likely positions when he received them.

**Scene B.** A feature of this part of the crime scene is the broken baby crib (Figs. 11A and 11B). There are two scenarios as to how it was broken. The most likely is that the first officer the entered the building after the shooting discovered a baby in the crib. In his effort to both extract the baby from the scene as well as interact with the scene as little as possible, the officer leaned over the end of the crib and pulled it toward him to grab the baby. He broke the crib as shown in Figs 11A and 11B during this process. Alternatively, it is possible that when Trust entered the S/E bedroom he fell against the crib, breaking parts of it into the crib (Fig. 11A ) as well as casting wood fragments onto the floor (Fig. 11B). The authors believe, considering the severity of Trust's back wound, that he was unable to lift himself high enough to break the crib.

The yellow table was in a position near the door and Trust was between it and the crib. Daniels could have been at the N/E bedroom door when, by Doty's revolver, Trust received a second bullet (Fig. 3, bullet 2, wound 4?). The yellow plastic table was a intermediate target for this second bullet to hit Trust by evidence of a bullet hole in one of the legs of the table (Fig. 11C). (The crib was moved toward the doorway, by an officer on the scene after the shooting.) The table was turned upside down and at some point Trust was on top of part of it, as evidence of blood on the underside of the table (Fig. 11C). The upside-down table had shifted east from this position in that a number of linear lines, apparently in blood and about the length of the table edge, are present on the carpet (Figs. 10 and 11B at arrow heads). The lamp was on the table when the table was upset, sending its glass top eastward several feet to the base of the northeast corner of the bed. A bent plug indicates the cord of the lamp was violently pulled from the wall. Trust most likely fired his second shot while he was in the S/E bedroom and after he had received his second bullet from Daniels. The second shot from Trust hit on the west side of the north window of the N/E bedroom (Fig. 9, red arrow 2). At this point, Daniels did not shoot again which gave Trust time to reach the bedroom door and close it. The doorknob did not have a privacy lock.

Trust, between the scenes B and C (Figs. 9 and 10) would have been crawling with some leg use, but mostly with his arms and hands. During this uncoordinated movement, magazines, papers and clothing on the floor were shifted. When he reached the chest of draws he turned, facing the bedroom door, his back toward the east wall.

**Scene C.** Trust now has his back against the left end of the bed (Fig. 12A arrow 1). He also contacted the corner of the chest of drawers (Fig. 12A arrow 2), and finally several positions against the east wall under the window (Fig. 12A arrow 3). Leaving blood transfers from his back wounds on the wall and a large stain on the brown carpet (Fig. 10).

When Daniels reached the closed S/E bedroom door, he apparently smashed the butt of the Doty revolver against the doorknob despite it not having a privacy lock. Either this caused the door to open or Daniels reached up from the floor, turned the knob and opened the door with force. When the door swung open and hit the wall, a piece of the damaged doorknob was projected out to fall on the yellow plastic table previously upset by Trust (Fig. 11C). At this



**Figure 12.** Scene C (A) The bloodstains below the east window. Some shards of glass from the window are on the floor, but most apparently are on the outside of the window. (1) Bloodstain deposited of the bed sheet; (2) Blood stain on the chest of drawers; (3) Multiple bloodstains on the east wall; (4) glass shards on the carpet on top of apparent blood stains. The size of the broken window and the small amount of glass on the floor indicate the window was broken from the inside. (B) The exterior of the house showing the east window of the S/E bedroom broken. The edges of the broken window have been accentuated in Photoshop.



**Figure 13.** Scene D. The deceased Officer Trust in the S/E bedroom; Trust's .38 revolver is on the bed and three of the four casings that he expelled from his revolver can be seen on the bed (short arrows). A reload strip is above the revolver and is shown in the inset. The screen was pushed in by an investigating officer after Daniels and Ross left the house.



**Figure 14.** The bed in the S/E bedroom with the body of Officer Trust and the other evidence removed. There was extensive bleeding on the bed by Trust.

point Trust fired his third shot (Fig. 9, red arrow 3). Daniels responded by pointing his (Doty's) revolver at the stacked laundry baskets near the door and firing through it to hit Trust (left arm? Fig. 3, lower left, wound 11; Fig. 9, blue arrow 6), fracturing the "the distal part of the left radius." The pain experienced by Trust from this wound was likely intense. Immediate bleeding from his left arm added to the stained carpet.

Trust, in response to the shot to his left arm, fired a fourth shot into the bedroom door. At this point, Trust made his way to the east side of the bed (Fig. 9 at D) where he not only had cover of the bed, but also could watch the door. It appears that about this time, Trust got up onto the northeast part of the bed, likely to break the east window (to call for help?). The window was broken near this time since window glass is on top of the rug blood stains (Fig. 12A, arrow 4). Daniels fired another shot at Trust during his momentary exposure while he was getting down from the bed, the bullet perforating Trust's right arm (Fig. 3, bullet 3, wounds 5 and 6) and hitting the wall (item 141). Daniels, upon seeing Trust's new position, withdrew.

**Scene D.** While watching the hall from the east side of the bed, Trust reloaded his revolver on the bed (4 casings and a reloading strip with two cartridges were on the bed, Fig. 13) despite

having wounds from at least three, probably four bullets. Daniels remained out of sight.

**Scene E.** Trust was on east side of the bed. Likely driven by desperation, he decided to attempt to escape out the south window. He hugged the wall under the south window leaving bloodstains on the left head region of the bed (Fig.14). Trust then broke the west side of the south window with the revolver in his right hand. Trust's right side was orientated toward the bedroom door and Daniels. When Trust started his attempt to flee out the window, Daniels reappeared and fired, hitting Trust in the right groin area (Fig. 3, bullet 3, wounds 5 to 6; Fig. 9 at E, blue arrow 3). It was at this time that some children on the street witnessed Trust partly fall through the widow and yell. The yell was likely in response to this new bullet hit. Trust's right arm and revolver were momentarily outside the window. At this time, Trust wildly fired his fifth and final shot (Fig. 9, red arrow 5), the bullet hitting the driveway. Upon this wound, Trust withdrew from the window and started turning around to return to the safety of the east side of the bed.

**Scene F.** Trust completed his turn and started to try to regain the side of the bed when Daniels fired the fifth and final cartridge in the Doty revolver. Trust's left side was orientated toward Daniels and he was flat on the bed with his left arm parallel to his body when he receive the final, fatal wound (Fig. 3, bullet 1, wounds 1,2 and 3; Fig. 9 at F, blue arrow 1). Trust stopped his movement while on the bed, apparently halfway off the bed with his head oriented toward the east wall. Witness Ross noted when she saw him that he was alive and on the bed. Ross stated at the end of this interview, "He was leanin' ... over like this, okay?" suggesting Trust was not fully lying on the bed at the time.

**Scene G.** Trust's body was found in the position shown in Fig 9 at G. After Daniels and Ross left the crime scene, Trust had turned around and regained the east side of the bed. He appears to have placed his revolver in the position found on the bed and then died.

## Conclusions

The selection of the right arm as Trust's first wound by the original crime scene analyst did not make sense when considering the totality of the crime scene in the S/E bedroom. The effect of that wound on Trust's movements in the S/E bedroom is incontrovertible. Interaction on this issue by the crime scene analyst with the medical examiner would likely have changed his focus to the back wound as the first to Officer Trust.

The complexity of the crime scene in the S/E bedroom means that some features of this crime scene reconstruction might not be in proper sequence. For instance, it is not clear as to the locations of Trust when some of his wounds were received or which of several of the wounds were received at a particular part of the crime scene.

Despite the number of uncertainties in this crime scene reconstruction, the most important conclusion is evident from our analysis: there were interludes between the shots from Daniels that indicated he had adopted a strategy of ambush with one shot and withdraw before Trust was able to effectively return fire. This strategy was effective for achieving Daniels' goal to

kill Trust. While Trust was in the S/E bedroom, all of Daniels shots hit Trust; none of Trust's return shots while he was in the S/E bedroom were successful. Daniels was likely listening for when Trust was moving, knowing that at such times Trust's revolver was not in a position to be quickly brought up to return fire or fire before Daniels was able to fire.

The reconstruction of the crime scene shows that Daniels hid his revolver upon the approach of the officers to arrest him with the intent to inflict harm. He ambushed the officers when he thought they were most vulnerable. Daniels executed Office Doty with the shot to the back of his head. He relentlessly pursued the wounded Officer Trust after Trust fled into the S/E bedroom. His pursuit was thoughtful and patient. Daniels only intent after the murder of Officer Doty was to kill Officer Trust, regardless of the danger to himself.

### **References**

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