

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

CAMERON THOMAS, Petitioner

v.

THE STATE OF NEVADA, Respondent

On Petition for Writ of Certiorari to the
Supreme Court of the State of Nevada

**APPENDIX TO PETITION FOR WRIT OF CERTIORARI TO THE
NEVADA SUPREME COURT**

VOLUME 9

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IN THE SUPREME COURT OF THE STATE OF NEVADA

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CAMERON THOMAS,

ORIGINAL

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

S.C. NO.: 70144

CASE NO.: C-11-277559-1

DEPT. NO.: IV

CLERK OF THE COURT

REPORTER'S TRANSCRIPT

OF

PROCEEDINGS

BEFORE THE HONORABLE KERRY L. EARLEY
DISTRICT COURT JUDGE

THURSDAY, JUNE 2, 2016

AT 1:00 P.M.

LAS VEGAS, NEVADA

APPEARANCES:

For the State:

DENA I. RINETTI, ESQ.
STACEY L. KOLLINS, ESQ.
Deputy District Attorney

For the Defendant:

JOEL M. MANN, ESQ.

REPORTED BY: GINA M. SHRADER, CCR NO. 647, RPR

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1 LAS VEGAS, NEVADA; THURSDAY, JUNE 2, 2016

2 1:01 P.M.

3 -oOo-

4

5 THE COURT: Continuation of the trial in
6 Case C-277559, the State of Nevada versus Cameron
7 Thomas.

8 Anything outside the presence of the
9 jury.

10 MS. KOLLINS: No, Your Honor.

11 MR. MANN: No, Your Honor.

12 THE COURT: I think we're ready. Bring
13 the jury in.

14 (The jury entered the courtroom.)

15 THE MARSHAL: Please be seated.

16 THE COURT: Does counsel stipulate to
17 the presence of the jury?

18 MR. MANN: Yes, Your Honor.

19 MS. RINETTI: Yes, Your Honor.

20 THE COURT: Mr. Mann, continue your
21 case.

22 Call your next witness, please.

23 MR. MANN: Yes, Your Honor. Defense
24 calls Jackie P. Taylor.

25 THE COURT: Jackie Taylor. Okay.

1 (The witness entered the courtroom.)

2 THE MARSHAL: You can remain standing,
3 face the clerk. She's going to swear you in.
4 Whereupon,

5 JACKIE TAYLOR,
6 having been called as a witness, and having been
7 first duly sworn to testify to the truth, was
8 examined and testified as follows:

9 THE WITNESS: Yes.

10 THE CLERK: Please be seated.

11 Please state your full name, spelling
12 your first and last name for the record.

13 THE WITNESS: Jackie Taylor,
14 J-a-c-k-i-e, T-a-y-l-o-r.

15 THE CLERK: Thank you.

16 THE COURT: Okay. Direct exam.

17

18 DIRECT EXAMINATION

19 BY MR. MANN:

20 Q. Good afternoon, Ms. Taylor.

21 How are you?

22 A. Good. How are you?

23 Q. Good, thank you.

24 Ms. Taylor, you're appearing today based
25 on a subpoena?

1 A. Yes.

2 Q. And where do you work?

3 A. I currently work for the school district
4 as a teacher.

5 Q. What grade do you teach?

6 A. Special Ed, first through third.

7 Q. And how long have you done that?

8 A. Three years.

9 Q. And where did you work before then?

10 A. Bright Child Learning Center.

11 Q. How long did you work at Bright Child
12 Learning Center?

13 A. For seven years.

14 Q. And in what capacity did you work there?

15 A. I worked from -- I was a floater in the
16 very beginning, which I went from classroom to
17 classroom. I was an assistant director and I ended
18 as a director.

19 Q. So you said you worked there for seven
20 years. Do you know what year you started?

21 A. May, um, January of 2006.

22 Q. So January of 2006, and then do you know
23 what year you stopped?

24 A. August of 2013.

25 Q. And when you ended, you had moved up to

1 the position as director?

2 A. Yes.

3 Q. Back in 2010, did you work at Bright
4 Child?

5 A. Yes.

6 Q. And what capacity did you work in 2010?

7 A. The assistant director.

8 Q. Where is Bright Child located?

9 A. Buffalo and Blue Diamond.

10 Q. And, um, what age is -- well, let me ask
11 you this, what is Bright Child?

12 A. Bright Child is a preschool and child
13 care center.

14 Q. What ages do they take?

15 A. Three months to 12 years.

16 Q. You say, 12 years, does mean they're a
17 school, that they --

18 A. School aged, yes.

19 Q. School aged, but do they teach school --

20 A. It's before and after school care.

21 Q. Okay. And what are the hours of Bright
22 Child?

23 A. 6:00 to 7:00 p.m., Monday through
24 Friday.

25 Q. So you worked there for seven years.

1 You're familiar with the building?

2 A. Yes.

3 Q. Back in 2010, were there any differences
4 with the building than it is back when you ended in
5 2013?

6 A. No.

7 Q. Can you describe the entrance of Bright
8 Child?

9 A. You would walk into the lobby and it's
10 closed off from the hallway where the classrooms
11 are.

12 Q. And what would you do at that point, if
13 you were a parent?

14 A. You would talk to the people at the
15 front desk.

16 Q. Would you have to check in or something?

17 A. Yes.

18 Q. And after that, what would be the next
19 course that a kid would take to get into the
20 facility?

21 A. The door to the hallway was locked, so
22 they would have to be buzzed in by someone at the
23 front desk.

24 Q. And the people at the front desk, what
25 can they see?

1 A. From the front desk?

2 Q. Yes.

3 A. They can see outside of the doors but
4 there's also web cams in the classrooms so we can
5 see, from the computer, all the class courtrooms.

6 Q. So those web cams, they're always on?

7 A. Yes.

8 Q. And they're available for the people at
9 the front desk to see?

10 A. Um-hmm, and for the parents.

11 Q. Just make sure when you -- instead of
12 saying "um-hmm," you say, yes.

13 A. Yes. Sorry.

14 Q. No problem. Thank you.

15 So how many classrooms were there?

16 A. There were 12, 12 or 13.

17 Q. And were there things other than a
18 classroom?

19 A. Yes.

20 Q. Was there a cafeteria?

21 A. No. There was a break room and there
22 was a kitchen and supply closets.

23 Q. Where would the kids have meals?

24 A. In their classrooms.

25 Q. Was there a playground?

1 A. Yes.

2 Q. And where was the playground?

3 A. At the end of the hallway closer to the
4 school-aged classroom.

5 Q. Now, as an assistant director in 2010,
6 did you work in a particular room?

7 A. No.

8 Q. What were your -- where were you
9 essentially stationed as an assistant director?

10 A. At the front desk.

11 Q. And at the front desk, could you see
12 other areas throughout the building?

13 A. From the front desk, no.

14 Q. How about -- you said that there were
15 web cams?

16 A. Through the web cams only.

17 Q. And was that something that you were
18 required to do was look at the web cams?

19 A. Yes.

20 Q. I'm sorry?

21 A. Yes.

22 Q. Thank you. Do you know how many
23 teachers were working there back in 2010?

24 A. Maybe 14 or 15.

25 Q. Do you know how many students or kids

1 there were?

2 A. I would say about 170.

3 Q. And we talked about the cameras briefly,
4 but are you familiar with how the cameras worked?

5 A. Somewhat.

6 Q. Um, could anyone view these cameras?

7 A. If they had a login and a password.

8 Q. And what is a login and a password? How
9 would they get that?

10 A. From the assistant director or the
11 director.

12 Q. And who would you give that to?

13 A. We would give it to the parents.

14 Q. Would any parent get it or you just
15 gave --

16 A. They had to request for a login and a
17 password.

18 Q. And in your experience as the assistant
19 director, did parents request their logins and
20 passwords?

21 A. Yes.

22 Q. Do you know if the cameras' worked 24/7?

23 A. Yes.

24 Q. Yes, they did?

25 A. Um-hmm.

1 Q. Do you have any personal knowledge if
2 the parents actually watched the cameras?

3 A. Oh, yes.

4 Q. How do you have personal knowledge of
5 that?

6 A. Parents would call and ask what their --
7 why their kid was running around the class and not
8 napping or instances like that.

9 Q. So you knew that there were people
10 definitely watching?

11 A. Oh, yes.

12 Q. Was there a lot of glass throughout the
13 facility?

14 A. Yes.

15 Q. Was that done in such a way that you
16 could see a lot of the rooms?

17 A. Yes.

18 Q. Is it fair to say that you could see
19 what was going on in each classroom throughout most
20 of the facility?

21 A. Yes.

22 Q. Now, as the assistant director, what are
23 your responsibilities?

24 A. To help manage the facility.

25 Q. And what did that entail?

1 A. That was making sure that the classrooms
2 were running appropriately, that the children were
3 taken care of as they should be; helping with any
4 of the teacher needs, supply orders, registering
5 students.

6 Q. Did you have to work with parents?

7 A. Yes.

8 Q. Did you have to work with the director?

9 A. Yes.

10 Q. Who was the director in 2010?

11 A. Cameron Thomas.

12 Q. And had you met Cameron Thomas before
13 that?

14 A. No.

15 Q. Had you -- at that point in 2010, had
16 you ever met a male day care worker?

17 A. No.

18 Q. Did that cause you some pause when you
19 met a male day care worker?

20 A. Yes.

21 Q. Tell me about that.

22 A. I had never worked with him before. I
23 never pictured a male even working or wanting to
24 work in a child care facility.

25 Q. Why that did that seem unusual to you?

1 A. I just thought it was unusual that a
2 male would want to work with -- with children of
3 that age.

4 Q. And that was upon meeting Cameron?

5 A. That was before meeting him.

6 Q. Now, when you met him, were you
7 apprehensive of him working there?

8 A. No. When I met him, everything changed.

9 Q. Why is that?

10 A. Because his personality and everything
11 about him, just made you feel comfortable. He was
12 so passionate about what he did. He -- he made me
13 love child care again.

14 Q. Did you -- at the time of starting back
15 in 2007, were you planning on having this go into
16 as a career?

17 A. No.

18 Q. In working with Cameron, you said that
19 he made you passionate again?

20 A. Yes.

21 Q. Did that make you want to go into it as
22 a career?

23 A. Yes.

24 Q. And so did that change your apprehension
25 about male employees?

1 A. Oh, yes.

2 Q. In your position assistant director,
3 were you able to observe Cameron with the kids?

4 A. Yes.

5 Q. Was there anything about how he acted
6 with the kids that caused you concern?

7 A. No.

8 Q. Was there anything that he did that you
9 thought was inappropriate?

10 A. No.

11 Q. To your knowledge, did he ever hurt a
12 child?

13 A. No.

14 Q. Did he ever show a particular favor
15 towards a certain child that caused you concern?

16 A. No.

17 Q. How was he with the kids?

18 A. They loved him. He was awesome. He
19 would go above and beyond for them. They'd play
20 games with him. They all loved him.

21 Q. What about how he was with the adults?

22 A. They all loved him as well.

23 Q. Now, Cameron was your boss?

24 A. Um-hmm.

25 Q. Is that a yes?

1 A. Yes.

2 Q. Was he professional?

3 A. Yes.

4 Q. Did he do things professionally that you
5 did not agree with?

6 A. No.

7 Q. Did he help you in your career for child
8 development?

9 A. Yes.

10 Q. How did he help?

11 A. He would put on trainings for our
12 employees and myself at our center to make it
13 easier for us to earn the units that we would have
14 to have as a requirement by the State each year.

15 Q. Did he -- did you take those continuing
16 education units outside the Bright Child as well?

17 A. Yes.

18 Q. So it wasn't only at Bright Child that
19 you would take these things?

20 A. Right.

21 Q. And so what was he like as a director?

22 A. He was easy to get along with. He was
23 understanding. He had worked in the classrooms
24 before, so he knew exactly where the teachers were
25 coming from, with any problems that they had. It

1 was great.

2 Q. Now, at Bright Child, would they do
3 something called Parent's Night Out?

4 A. Yes.

5 Q. What is Parent's Night Out?

6 A. It is -- it was every other Friday, I
7 believe, and it's where the parents could drop
8 their kids off for an amount of time, after hours,
9 and staff members would watch them while the
10 parents went out for the night and then they would
11 come pick them back up afterwards.

12 Q. Did you ever staff Parent's Night Out?

13 A. I did.

14 Q. How often would you staff Parent's Night
15 Out?

16 A. Possibly every other time that it
17 occurred.

18 Q. So a lot; is that fair?

19 A. Yes.

20 Q. Okay. Back in 2010, did you staff
21 Parent's Night Out?

22 A. Yes.

23 Q. Would you go to these Parent's Night Out
24 sessions alone?

25 A. My husband would come sometimes.

1 Q. Why would your husband come?

2 A. Because it was late at night and I lived
3 in Henderson, and that's a really long drive from
4 Buffalo and Blue Diamond, so he didn't feel
5 comfortable letting me go alone.

6 Q. So what would he do while you were there
7 at Parent's Night Out?

8 A. He would sit in the back of the room on
9 his phone, talk to us.

10 Q. And what other staff members would work
11 when you did Parent's Night Out?

12 A. Sometimes it was our closer. And
13 sometimes it was Cameron.

14 Q. And how many kids would be at Parent's
15 Night Out?

16 A. I'd say maybe max, 30.

17 Q. 30 you said?

18 A. Um-hmm.

19 Q. How many staff members would be there?

20 A. Two.

21 Q. Any more than two?

22 A. No.

23 Q. And what would go on at these Parent's
24 Night Out?

25 A. We would order pizza and have root beer

1 floats and the kids would watch movies.

2 Q. And would all the kids watch the movies
3 at the same time or would some kids watch movies
4 and get up and other kids would get up and play?

5 A. Yes. Some would play and some would
6 watch movies.

7 Q. In my house, it's hard to get all three
8 to do the same thing at the same time?

9 A. Right.

10 Q. So that was a similar experience?

11 A. Yes.

12 Q. But with 30 kids?

13 A. Right.

14 Q. And the size of the room where this
15 Parent's Night Out would happen, how big was that
16 room?

17 A. It was the biggest in the center. Maybe
18 15 feet by 10 feet.

19 Q. Okay. Do you see this room?

20 A. Um-hmm.

21 Q. Would it be --

22 A. It's a little smaller than this one.

23 Q. So it would be smaller than this room?

24 A. Um-hmm.

25 MR. MANN: Okay. And Your Honor, I'm

1 referring to the courtroom, when I say, "this
2 room."

3 THE COURT: For the record, you're
4 referring to the courtroom. That's good.

5 MR. MANN: Thank you.

6 BY MR. MANN:

7 Q. What -- would Cameron always do Parent's
8 Night Out?

9 A. No.

10 Q. Who else would do Parent's Night Out?

11 A. Our closer.

12 Q. Was it just the three of you or was it
13 open to all of your staff?

14 A. It was open to anyone who wanted to.

15 Q. Was it mandatory to do?

16 A. No.

17 Q. So it was volunteer for the staff?

18 A. Yes.

19 Q. Do you know a child by the name of Molly
20 Sproles or Molly Barbian?

21 A. Yes.

22 Q. How do you know her?

23 A. Just her enrollment at Bright Child.

24 Q. Was she at Bright Child when you were
25 there?

1 A. Yes.

2 Q. Do you know about when she was there?

3 A. Between May of 2010 to December, 2010.

4 Q. And did you observe her? Were you able
5 to see her interact.

6 A. Yes.

7 Q. Did you personally interact with her?

8 A. Possibly.

9 Q. To your knowledge, did she ever go to
10 Parent's Night Out?

11 A. Yes.

12 Q. Um, did you ever see her with Cameron?

13 A. Yes.

14 Q. Um, would she stay around Cameron?

15 A. Yes.

16 Q. Um, have you ever seen Molly on
17 Cameron's lap?

18 A. Yes.

19 Q. Do you remember a time when that
20 happened?

21 A. Yes.

22 Q. When was that?

23 A. That was a Parent's Night Out.

24 Q. And how do you remember seeing Molly on
25 Cameron's lap?

1 A. She was with a couple of her friends and
2 -- and they were sitting around him. A lot like
3 the other kids that would always be around him.

4 Q. So that was my question, was it a normal
5 thing to have kids on Cameron's lap?

6 A. It -- all teachers' laps.

7 Q. All teachers' laps?

8 A. Yes.

9 Q. Was it unusual to see Molly on Cameron's
10 lap?

11 A. No.

12 Q. Did you say anything to Molly at this
13 time?

14 A. I had said something to all of the
15 students, and I told them to go play with their
16 friends and sit with the rest of the group.

17 Q. Why would you say something like that to
18 them?

19 A. Just so they can interact with their
20 peers, as opposed to the teachers.

21 Q. Was -- during that time, did she seem
22 scared to be around Cameron?

23 A. No.

24 Q. Was there any time that you remember
25 that Molly was -- became upset when she was around

1 Cameron?

2 A. No.

3 Q. Um, was there a time that she seemed
4 like she did not want to be dropped off at Parent's
5 Night Out?

6 A. No.

7 Q. Um, do you have any knowledge of when
8 Molly actually stopped going to Bright Child?

9 A. I don't. I don't remember.

10 Q. If you observed in anything
11 inappropriate with a child and Cameron, would you
12 report it?

13 A. Yes.

14 Q. Are you a mandatory reporter?

15 A. Yes.

16 Q. What is a mandatory reporter?

17 A. If you suspect or have seen any child
18 abuse or neglect you have to report it to the
19 State.

20 Q. Are all day care workers mandatory
21 reporters?

22 A. Yes.

23 Q. Did you ever report anything about
24 Cameron?

25 A. No.

1 Q. Um, in January of 2011, um, was there
2 news that came out about Cameron being arrested?

3 A. Yes.

4 Q. Was there ever a time that the news came
5 to Bright Child?

6 A. Yes.

7 Q. Can you describe that?

8 A. They would walk into our facility and we
9 were told to tell them to leave immediately.

10 Q. Was it a little bit of media or a lot of
11 media?

12 A. I would say there were at least three
13 news stations. They were parked in the parking
14 lot.

15 Q. And were they there for a short time,
16 long time?

17 A. I'd say a good three weeks.

18 Q. Three weeks?

19 A. Um-hmm.

20 Q. So they were there for a good amount of
21 time?

22 A. Yes.

23 Q. Do you remember when they started to
24 arrive, when the first time they were there?

25 A. I believe after he got arrested and he

1 was on the news.

2 Q. Did you observe any parents being
3 stopped to ask questions?

4 A. Yes.

5 Q. Was there discussion within Bright Child
6 about this?

7 MS. RINETTI: Objection, hearsay.

8 MR. MANN: I'm not asking what they
9 said. I'm just asking if there was discussions
10 about it.

11 THE COURT: Okay. I'll overrule it, but
12 he can ask that but not what any out of court
13 statement, what was said.

14 THE WITNESS: Okay.

15 THE COURT: Because sometimes they'll
16 answer --

17 BY MR. MANN:

18 Q. So more specifically, I don't want to
19 know what anyone told you.

20 A. Okay.

21 Q. I just want to know was there a
22 discussion about it?

23 A. From who?

24 Q. Was there a buzz --

25 A. Yes.

1 Q. Within Bright Child?

2 A. Yes.

3 Q. About all this news media and about
4 Cameron?

5 A. Yes.

6 Q. Okay. Thank you. In your time working
7 Cameron, were you able to get to know him as a
8 person?

9 A. Yes.

10 Q. Did you ever socialize with him outside
11 of work?

12 A. Yes.

13 Q. In what capacity did you socialize with
14 him outside of work?

15 A. I would go to his house with my husband,
16 we would go to his children's birthday parties,
17 things of that nature.

18 Q. What do think of him as a person?

19 A. I think he's wonderful. He's
20 passionate, he's giving, he's kind, he's loving.

21 Q. Did you ever know him to hurt a child?

22 A. No.

23 MR. MANN: I'll pass the witness.

24 THE COURT: Okay. Cross-exam.

25 MS. RINETTI: Judge, may I approach your

1 clerk?

2 THE COURT: Yes.

3 MS. RINETTI: Thank you so much.

4

5 CROSS-EXAMINATION

6 BY MS. RINETTI:

7 Q. Good morning, Mrs. Taylor -- or good
8 afternoon, I should say?

9 A. Good afternoon.

10 Q. I'm Dena Rinetti with the DA's office.
11 I'm going to ask you a couple questions. Okay?

12 A. Okay.

13 Q. You mentioned that you're a school
14 teacher --

15 A. Yes.

16 Q. -- and have been for a couple of years?

17 A. Yes.

18 Q. I believe it's pursuant to Clark
19 County's unified school district policy that each
20 teacher attends a boundary class. Are you aware of
21 that boundary class?

22 A. No.

23 Q. You've never taken a boundaries class?

24 A. No.

25 Q. You mentioned that during your time at

1 Bright Child, that you were the assistant director
2 and you had a number of different duties
3 interacting with parents, correct?

4 A. Yes.

5 Q. Interacting with staff, correct?

6 A. Yes.

7 Q. Interacting with the kids, correct?

8 A. Yes.

9 Q. And on occasion you go in classrooms and
10 assisting the teachers; is that fair to say?

11 A. Yes.

12 Q. But you were stationed at the front
13 desk --

14 A. Yes.

15 Q. -- as your time as assistant director.
16 But when you would help with the kids or with
17 teachers obviously you would have to leave the
18 front desk, correct?

19 A. Yes.

20 Q. You mentioned that there were cameras.
21 How many cameras were at Bright Child?

22 A. There was one in each classroom, as well
23 as in the lobby.

24 Q. What about the big room where Parent's
25 Night Out is? How many cameras are in that one?

1 A. I believe one.

2 Q. Okay. And could -- how long did Bright
3 Child retain the video of that particular day.
4 Let's say Bright Child was going today and the
5 video was running, how long would Bright Child keep
6 that video?

7 A. I don't know.

8 Q. You mentioned that at Parent's Night
9 out, that during Bright Child there's approximately
10 15 teachers employed back in 2010?

11 A. Yes.

12 Q. And 170 students?

13 A. Yes.

14 Q. So it would have been about one and a
15 half teachers to every 17 kids; if my ratio is
16 correct?

17 A. About, yes.

18 Q. You mentioned that it's not unusual for
19 kids to sit on teachers' laps, correct?

20 A. Yes.

21 Q. So if you saw that on the video screen
22 and you're at the front desk, that wouldn't have
23 caused you concern, correct?

24 A. No.

25 Q. You wouldn't have reported it, correct?

1 A. No.

2 Q. You wouldn't have gone to the classroom
3 to see what was going on, correct?

4 A. No.

5 Q. You mentioned the Parent's Night Out,
6 that there would be pizza and root beer floats and
7 movies. During the movie time, would the lights be
8 off?

9 A. Yes.

10 Q. You also mentioned that you knew a child
11 by the name of Molly Sproles, correct?

12 A. Yes.

13 Q. That's through her enrollment at Bright
14 Child, correct?

15 A. Yes.

16 Q. But that you didn't have that much
17 interaction with Molly?

18 A. No.

19 MS. RINETTI: Okay. I'm going to show
20 you Defendant's G-7?

21 BY MS. RINETTI:

22 Q. You mentioned on direct examination that
23 you saw the defendant interact a lot with Molly; is
24 that fair to say? You had some opinions about her
25 -- his interactions with Molly, correct?

1 A. Yes.

2 Q. Can you point to Molly in that
3 photograph?

4 THE COURT: Can you look -- is your
5 small screen on or you can't.

6 THE WITNESS: Mine is, yes. Point it on
7 my screen?

8 MS. RINETTI: Yes.

9 THE COURT: I just want to make sure.

10 THE WITNESS: This one (indicating.)

11 BY MS. RINETTI:

12 Q. That one is Molly?

13 A. Yes.

14 Q. Thank you so much. And you saw Molly on
15 his lap?

16 A. Yes.

17 Q. And you saw Molly on his lap at Parent's
18 Night Out, correct?

19 A. Yes.

20 Q. And that eventually Molly left the
21 facility, correct?

22 A. Correct.

23 Q. And in fact, isn't it true that Molly
24 left as soon as news broke that the defendant had
25 been arrested, correct?

1 A. I'm not sure.

2 Q. Okay. Did you see Molly after the news
3 broke?

4 A. I'm not sure.

5 Q. Okay. I know you talked a little bit
6 about your interactions with the defendant. Are
7 you aware of the charges he is facing?

8 A. Yes.

9 Q. Are you aware that he's facing multiple
10 counts of sexual assault with a child under the age
11 of 14.

12 A. Yes.

13 Q. Are you aware he's also facing multiple
14 counts of lewdness of a child under the age of 14,
15 correct?

16 A. Yes.

17 Q. And he's also facing multiple charges of
18 attempt lewdness of a child under the age of 14,
19 correct?

20 A. Yes.

21 Q. Do you have any children, ma'am?

22 A. I do.

23 Q. And how old is your child?

24 A. He's four.

25 Q. He's four. So he was born or she was

1 born in --

2 A. 2012.

3 Q. 2012.

4 MS. RINETTI: All right. Thank you.
5 Nothing further.

6 THE COURT: Okay. Redirect.

7 MR. MANN: Court's indulgence. Nothing,
8 Your Honor.

9 THE COURT: Okay. Any juror questions?
10 (Whereupon there was a conference at the bench that
11 was not requested to be reported.)

12 THE COURT: All right. I get to ask you
13 a question from a juror.

14 It's Jackie, but do you know whether
15 Cameron initiated the Parent's Night Out program at
16 Bright Child?

17 THE WITNESS: He did.

18 THE COURT: Okay. Any follow-up from
19 that question, Mr. Mann?

20 MR. MANN: No, Your Honor.

21 THE COURT: And Ms. Rinetti.

22 MS. RINETTI: No, Your Honor.

23 THE COURT: Okay. All right. You're
24 excused. Thank you very much for coming, ma'am.

25 THE WITNESS: Thank you.

1 (The witness exited the courtroom.)

2 THE COURT: Next witness, Mr. Mann.

3 MR. MANN: Your Honor, the defendants --
4 the defense calls Ms. Danielle Wasser (sic).

5 THE COURT: Okay. Is it Wasser (sic)?

6 MR. MANN: Yes.

7 THE COURT: Thank you.

8 MR. MANN: Your Honor, I may have
9 misspoke. It may be Wasso. I apologize.

10 THE COURT: Well, we'll find out when
11 she takes the stand, so we're good. Okay.
12 Daniel's coming. We're good.

13 All right. You're okay. Come on in.

14 THE COURT: You look like you're walking
15 on eggshells. It's okay.

16 THE WITNESS: I'm like do I follow him.

17 THE COURT: You can follow him.

18 THE WITNESS: Sorry.

19 THE CLERK: Please, raise your right
20 hand.

21 Whereupon,

22 DANIELLE WASSO,
23 having been called as a witness, and having been
24 first duly sworn to testify to the truth, was
25 examined and testified as follows:

1 THE WITNESS: Yes, I do.

2 THE CLERK: Thank you. Please be
3 seated.

4 Will you, please, state your full name,
5 spelling your first and last name, for the record.

6 THE WITNESS: Danielle Wasso,
7 D-a-n-i-e-l-l-e, W-a-s-s-o.

8 THE CLERK: Thank you.

9 THE COURT: Okay. Direct exam.
10

11 DIRECT EXAMINATION

12 BY MR. MANN:

13 Q. Good afternoon, Ms. Wasso.

14 A. Hi.

15 Q. Sorry. I had your name incorrect. I
16 apologize. Where do you work?

17 A. At Las Vegas Limousines, Reese
18 Management.

19 Q. How long have you worked there?

20 A. Going on four years.

21 Q. Do you know a person by the name of
22 Cameron Thomas?

23 A. Yes, I do.

24 Q. How do you know him?

25 A. I know Cameron Thomas from the day care

1 center that my children attended.

2 Q. How many children do you have?

3 A. I have two.

4 Q. What are their names?

5 A. Isabella Jorgenson and Christian
6 Jorgenson.

7 Q. And what are their ages?

8 A. Isabella is 14 and Christian is 16.

9 Q. And you said they attended a day care?

10 A. Yes.

11 Q. Where was that day care?

12 A. Kids 'R' Kids. It was on Durango.
13 Sahara and Durango area; buffalo, Durango, sorry.

14 Q. Does Cimarron ring a bell?

15 A. Yes.

16 Q. And what year did your kids go to Kids
17 'R' Kids?

18 A. It was the end of 2004 to the beginning
19 of -- the end of 2006, beginning of 2007, in that
20 area.

21 Q. And during that time, did you meet Mr.
22 Thomas?

23 A. Yes.

24 Q. And did you interact with him?

25 A. Yes.

1 Q. As a parent -- well, let me ask you
2 this: Did both your kids go to Kids 'R' Kids?

3 A. Bella was the primary attendee of Kids
4 'R' Kids and Christian, he was going into first
5 grade, so he wasn't there, like, periodically. He
6 wasn't a full-time attendee like Bella was.

7 Q. Did you work when your kids were at Kids
8 'R' Kids?

9 A. Yes.

10 Q. And where did you work?

11 A. I worked at Castle Management. They
12 were an association management company.

13 Q. And were you familiar if there were any
14 security features at Kids 'R' Kids?

15 A. Security, well, there was a lot of
16 security. There was the cameras that you got to
17 view your kids from. You had to be buzzed in
18 through the front door, sign-in computer system to
19 check the kids in.

20 Q. So let's talk about the camera's. Did
21 you utilize those cameras?

22 A. In the beginning, I did.

23 Q. And how would you utilize them?

24 A. You logged in. You had a user ID and a
25 password, and you logged into the website and you

1 could view practically almost the whole school.

2 Q. Did you do that as a parent?

3 A. In the beginning, yes.

4 Q. And as a parent, would you go and pick
5 up your children at Kids 'R' Kids?

6 A. I did but Cameron used to bring Bella
7 home for me in the end or in the middle to the end.

8 Q. So let's talk about the beginning.

9 A. Um-hmm.

10 Q. Did you know Mr. Thomas in the
11 beginning?

12 A. Yes.

13 Q. You knew him before you started going to
14 Kids 'R' Kids?

15 A. No. I only knew him from Kids 'R' Kids.

16 Q. Okay. And so you met him when you
17 started taking your children to Kids 'R' Kids?

18 A. Yes.

19 Q. And it sounds like you developed a
20 connection with Mr. Thomas?

21 A. Yes.

22 Q. How did that connection occur?

23 A. He was Mr. Cameron. He was -- we
24 interacted with him every, single day that we went
25 to the day care center. When I would pick the kids

1 up -- then we just -- we became friends. We -- we
2 did hang out outside of Kids 'R' Kids.

3 Q. How often would you guys do that?

4 A. I would say often. We used to have
5 birthday parties together. Barbecues together.
6 Weekend hangouts together.

7 Q. And you said that eventually you had Mr.
8 Thomas drive home your daughter, Isabella?

9 A. Yes.

10 Q. How old was she?

11 A. Isabella was about five, five and a half
12 at that time.

13 Q. And why would you have him drive her
14 home?

15 A. At that time, I was not, no longer going
16 to be working at Castle Management. I was going to
17 be working at a company that would be closer to my
18 home.

19 So I was actually going to take Isabella
20 from Kids 'R' Kids because it was all the way
21 across town from -- from where I lived.

22 But I didn't really want to pull her
23 from the relationships that she had with children
24 and the teachers from Kids 'R' Kids.

25 And Cameron and Jennifer lived not too

1 far away from me. So it was convenient at that
2 time and he offered.

3 Q. Was there anything about your experience
4 with your daughter being driven by Mr. Thomas that
5 caused you any sort of concern?

6 A. No.

7 Q. Did your daughter ever express anything
8 to you that made you be concerned?

9 A. No.

10 Q. Now, when you would socialize with
11 Cameron's family, was it just you or was it your
12 family?

13 A. It was my family.

14 Q. And so that you, your husband and your
15 two children?

16 A. Um-hmm and my mother.

17 Q. And so when you said, "um-hmm," was that
18 a yes?

19 A. Yes. Sorry.

20 Q. I just wanted to make sure.

21 Was there ever a time that in your
22 socializing with Mr. Thomas that you were concerned
23 about how he treated others?

24 A. No.

25 Q. Was there ever a time that you were

1 concerned about how he treated children?

2 A. No.

3 Q. Was there ever a time that your kids
4 indicated that they had some sort of concern?

5 A. No.

6 MS. KOLLINS: Objection. Hearsay.

7 MR. MANN: I'm not asking what they
8 said.

9 MS. KOLLINS: They indicated.

10 THE COURT: That's asking for -- the
11 basis is hearsay. Is that your objection?

12 MS. KOLLINS: Well, yes.

13 THE COURT: Yes. I'm going to sustain
14 that although -- did she answer?

15 MR. MANN: She did.

16 THE COURT: She did. Okay.

17 I guess since I'm going to sustain the
18 objection, I'm going to go ahead and ask you to
19 disregard that answer, but please, you can rephrase
20 it however you would like, Mr. Mann.

21 BY MR. MANN:

22 Q. To this day, do you have any knowledge
23 of anything that may have happened to your kids?

24 A. No.

25 Q. Are you familiar with the time when

1 Cameron was arrested?

2 A. Yes.

3 Q. How did you become aware that Mr. Thomas
4 had been arrested?

5 A. My mom had called and told me.

6 Q. And do you know how she became aware?

7 A. I believe she saw it on the news.

8 Q. Did you end up seeing it on the news
9 yourself?

10 A. I did not.

11 Q. Do you feel like you know Cameron as a
12 person?

13 A. Yes.

14 Q. And what do you think of him as a
15 person?

16 A. I think Cameron is a very honest person.
17 I think he's very caring. I think he's very
18 friendly. I think he works very hard. I think
19 he's just -- overall he's just a nice person.

20 Q. Have you ever known him to hurt a child?

21 A. No.

22 MR. MANN: I'll pass the witness.

23 THE COURT: Okay. Cross-exam.

24 MS. KOLLINS: Thank you.

25 THE COURT: You're welcome.

1 CROSS-EXAMINATION

2 BY MS. KOLLINS:

3 Q. Good afternoon, ma'am. How are you?

4 A. Good. How are you.

5 Q. My name is Stacey Kollins with the
6 District Attorney's Office. I'm going to ask you
7 just a few questions today. Is that okay?

8 A. Okay.

9 Q. You know why Mr. Thomas is here,
10 correct?

11 A. Yes.

12 Q. You know the charges that are
13 outstanding?

14 A. Yes.

15 Q. Okay. Would you feel the same way about
16 having him around your children knowing the charges
17 in this case?18 A. I would still have him around my
19 children, yes.20 Q. Isabella was two to five years old at
21 Bright Child?

22 A. No.

23 Q. No. How old was she?

24 A. She did go to Bright Child.

25 Q. I'm sorry. Kids 'R' Kids.

1 A. She was between the end of four years to
2 six and a half.

3 Q. Okay. What's her birthday. I'm sorry.

4 A. July 13th, 2001.

5 Q. Okay. And didn't you say you quit
6 taking her there in 2006?

7 A. No. It was the end of 2006, beginning
8 -- going -- the end of 2006.

9 Q. The end of 2006 to the beginning of
10 2000 --

11 A. Yes.

12 Q. So she was five and a half then. My
13 mistake.

14 A. Yes.

15 Q. I didn't count the months?

16 A. Okay. Yeah.

17 Q. Did she go to Parent's Night Out?

18 A. No.

19 Q. Okay. Did your son go to Parent's Night
20 Out?

21 A. No.

22 Q. Okay. When Isabella was at Kids 'R'
23 Kids, you said you used the cameras to kind of
24 watch out for her?

25 A. In the beginning.

1 Q. What room would she have been in when
2 you were using the cameras?

3 A. I don't remember the room number. She
4 was in Iris's class. I could tell you how to get
5 to the room, but I don't remember the room number.

6 Q. Well, when she first started going, how
7 old are we talking?

8 A. She was at the end of four years old.

9 Q. Oh, oh. I thought you said you started
10 taking her from the time near where she was born
11 until she was four?

12 A. No. No.

13 Q. Okay. So she was only there for about a
14 year and a half?

15 A. Yes.

16 Q. Okay. So she was walking around and
17 everything?

18 A. Oh, yeah.

19 Q. She wasn't in the baby room? All right.

20 A. No. She wasn't a baby.

21 Q. I just misunderstood --

22 A. Yeah, okay.

23 Q. Your testimony. Is that okay?

24 A. Yeah.

25 Q. All right. You socialize with Cameron.

1 When was that?

2 A. The time frame that we went to Kids 'R'
3 Kids, maybe a few months after we started going.

4 Q. How many times did you go to his home?

5 A. Numerous times. I don't -- I couldn't
6 tell you exactly how many because we hung out, and
7 I also picked her up from there.

8 Q. Do you know April Reed?

9 A. Yes, well, I've met April, yes.

10 Q. Do you know Kay?

11 A. Yes.

12 Q. Friendly with them?

13 A. Yeah. I mean, we were all together. I
14 wouldn't go as far as saying that I was friends
15 with them, but I mean, they were always, they were
16 part of the people that hung out so.

17 Q. Part of the social group?

18 A. Yes.

19 Q. Did you know Cameron before you started
20 going to Kids 'R' Kids as a friend or --

21 A. No.

22 Q. -- did you meet him there?

23 A. I met him there.

24 MS. KOLLINS: We need to try to not
25 speak at the same time because she's writing down

1 everything you say.

2 THE WITNESS: Okay. Sorry.

3 MS. KOLLINS: That's okay.

4 BY MS. KOLLINS:

5 Q. Did you ever leave your children at
6 Cameron's home to be babysat?

7 A. Yeah. Yes.

8 Q. How many times?

9 A. Well, he used to drive her home from day
10 care. So I would say some weeks if she was there
11 three days a week, some days -- some weeks she
12 could have been there five days a week.

13 Q. So she would -- Cameron would take her
14 home with him and then you would go pick her up?

15 A. Yes.

16 Q. So before when you said he drove her
17 home from day care, it wasn't straight home. It
18 was to his home and then you would pick her up from
19 there?

20 A. Yes.

21 Q. And that would happen three to five
22 times a week?

23 A. Um-hmm.

24 Q. Would Jennifer be there or would
25 Jennifer be working?

1 A. Jennifer would be there when she got
2 home from work, but when they first would get to
3 the home, no, she wasn't there.

4 Q. And what time would Cameron leave Kids
5 'R' Kids with your child?

6 A. I don't know the exact time. Sometimes
7 it -- I guess it would depend on what time they
8 were leaving that day or work duties were done. I
9 know that I always picked Bella up by 6:00. So I
10 guess they would leave anywhere between, I would
11 have to guess, maybe 3:00, 3:30, 4:00 o'clock.

12 Q. Okay. And then you would leave your job
13 across town in Henderson and come?

14 A. No. At that time, I was starting to
15 work closer to home.

16 Q. Okay.

17 A. So I didn't work in Henderson.

18 Q. Okay. Where would you travel from to go
19 pick them up at Cameron's house?

20 A. Rancho and 95 area.

21 Q. And you do that about 6 PM?

22 A. About -- between 5:00, 5:00 and 6:00.

23 Q. Okay. Other than those times, when he
24 would watch Isabella after work, well, after his
25 work, before time for you to pick him up, did you

1 ever leave them there for overnights?

2 A. No.

3 MS. KOLLINS: Court's indulgence.

4 BY MS. KOLLINS:

5 Q. And your son, did he do any Parent's
6 Night Out?

7 A. No.

8 Q. No. Did he have any overnights at
9 Cameron's home?

10 A. No.

11 THE COURT: Okay. Redirect. Any?

12 MR. MANN: Court's indulgence. Nothing,
13 Your Honor.

14 THE COURT: Okay. Any juror questions?

15 No? Okay. I want to make sure. All
16 right. Thank you very much, ma'am. Appreciate you
17 coming.

18 THE WITNESS: Thank you.

19 THE COURT: You're welcome.

20 (The witness exited the courtroom.)

21 THE COURT: Okay. Hold on. Let me make
22 sure my Marshal hear's the name.

23 MR. MANN: Defense calls Jolyn Welch.

24 MS. RINETTI: If we can approach.

25 ///

1 (Whereupon there was a conference at the bench that
2 was not requested to be reported.)

3 (The witness entered the courtroom.)

4 THE MARSHAL: Face the clerk. She's
5 going to swear you in.

6 THE CLERK: Please raise your right
7 hand.

8 Whereupon,

9 JOLYN WELCH,
10 having been called as a witness, and having been
11 first duly sworn to testify to the truth, was
12 examined and testified as follows:

13 THE WITNESS: Yes ma'am.

14 THE CLERK: Thank you. Please be
15 seated.

16 Will you please state your full name,
17 spelling your first and last name for the record.

18 THE WITNESS: Jolyn Marie Welch and it's
19 spelled J-o-l-y-n. My last name is W-e-l-c-h.

20 THE CLERK: Thank you.

21 THE COURT: Okay. Thank you.

22 THE WITNESS: You're welcome.

23 THE COURT: Direct exam, Mr. Mann.

24 MR. MANN: Thank you, Your Honor.

25 ///

1 DIRECT EXAMINATION

2 BY MR. MANN:

3 Q. Good afternoon, Ms. Welch?

4 A. Hi.

5 Q. How are you?

6 A. I am a little nervous but I'm okay.

7 Q. Okay. Well, there's some water right
8 there.

9 A. Okay.

10 Q. And tissue just in case but take a deep
11 breath?

12 A. Okay. Okay.

13 Q. Where do you work?

14 A. Right now, I currently work for myself
15 with Transaction Placement. It's a company that
16 I'm -- that I own.

17 Q. How long have you been doing that?

18 A. About just a few months. I started in
19 January of 2016.20 Q. And was there ever a time that you
21 worked at a facility called Kids 'R' Kids?

22 A. Yes, sir.

23 Q. When did you work there?

24 A. From August 6th of 2009, until July of
25 2015.

1 Q. So it's fair to say you stopped work
2 there about six years?

3 A. Almost, yes.

4 Q. Why did you leave?

5 A. It was time for me to be home with my
6 family. My husband and I were able to afford me
7 coming back home and working or staying home with
8 my children, and I had some differences with
9 management that I was ready to go.

10 Q. You said children. How many children do
11 you have?

12 A. I have four.

13 Q. And what are their names and ages?

14 A. I have Isabella and she is 13. I have
15 Alexandria and she is 11. Austin is seven and
16 Jackson is five.

17 Q. Two girls, two boys?

18 A. Yes, sir.

19 Q. You said that you started working at
20 Kids 'R' Kids in June of, I'm sorry, in August of
21 2009; is that right?

22 A. Yes.

23 Q. In June of 2009, were you working at
24 Kids 'R' Kids?

25 A. I was volunteering as a parent.

1 Q. Do you know when your kids started going
2 to Kids 'R' Kids?

3 A. Isabella had started when she was just a
4 few months old, so in January of 2003.

5 Q. And did Alexandria eventually start
6 going as well?

7 A. She did.

8 Q. And how long did you have them in Kids
9 'R' Kids?

10 A. They were enrolled starting then and
11 then they stayed at Kids 'R' Kids up until I left
12 in July of 2015. And --

13 Q. So is it fair to say that Isabella
14 pretty much aged out?

15 A. Yes, she did.

16 Q. What are the age groups of Kids 'R'
17 Kids?

18 A. Once the child turns 13, they're no
19 longer allowed to go. So Isabella was just two
20 months shy of aging out of there.

21 Q. And so back in June of 2009, you said
22 you were volunteering.

23 What does that mean?

24 A. The owner had talked to me about coming
25 in. They had done a large order for the -- for the

1 school, of different products and stuff for them
2 and they had asked if I could come in and help
3 organize them and take invoices and help distribute
4 and create, like, an organizational system for the
5 large supply that they had ordered.

6 Q. And did you do that alone or did you
7 have help?

8 A. No. I had help with it.

9 Q. And who helped you?

10 A. Cameron Thomas.

11 Q. Was there anyone else that would help
12 you?

13 A. Originally Kashonda Williams did but
14 she -- she -- she stopped working there shortly
15 after.

16 Q. Um --

17 A. A few months after.

18 Q. I'm sorry.

19 A. A few months after. I'm sorry.

20 Q. Do you know how -- how long it took you
21 to deal with this order?

22 A. We had started in June and we kept
23 going, almost up until I had -- until I was hired.

24 Q. So August?

25 A. Yeah.

1 Q. So it took about two months?

2 A. Yes.

3 Q. Do you remember about when in June that
4 the order came in?

5 A. No. When they had called me to come in,
6 the order had already been in. There was just a
7 few boxes that were still coming in afterwards.

8 Q. And do you remember when they called you
9 to come in?

10 A. I don't recall the specific date, no.

11 Q. Was it the beginning of the month, the
12 middle of the month, the end of the month?

13 A. It was around the middle of the month
14 that I had started to come in.

15 Q. Now, when you say, "a big order," how
16 big was it? I mean, did it take up a classroom?

17 A. Yes. They actually shut down a
18 classroom to house the order.

19 Q. And did it feel -- fill to the ceiling
20 or?

21 A. No. It was about -- it was about a
22 \$10,000 order that they had placed from various
23 companies and as they brought the boxes in,
24 everything needed to be taken out of the boxes and
25 then we had it spread out throughout the

1 classroom, depending on the different areas that it
2 would go into when it was finally disbursed.

3 Q. So in that room, essentially, you would
4 start segregating boxes as to what rooms they would
5 eventually go into?

6 A. Correct.

7 Q. Now, you said a \$10,000 order. What
8 made you aware of how much the price of the order
9 was?

10 A. Well, when the owner had called. She
11 had said how much the order was and going
12 through --

13 Q. Who's the owner that we're talking
14 about?

15 A. Sheila Walker was the owner that called
16 me.

17 Q. Do you know how many owners there were?

18 A. Yes. Yes, I do know.

19 Q. How many owners were there?

20 A. There's Jack, Anita, Sheila, Bonnie
21 and -- there's five owners who own the actual
22 business itself.

23 Q. You said Bonnie, is that one of the
24 orders?

25 A. Yes, Bonnie Hart.

1 Q. "Owners."

2 A. Yeah, Bonnie Hart.

3 Q. And why would Sheila tell you about the
4 price of this order?

5 MS. RINETTI: Objection. Speculation.

6 THE COURT: I'm going to sustain. I'm
7 going to sustain the objection, unless you know.
8 We need a foundation. So we don't want you to
9 guess or speculate.

10 So when someone asks you a question, if
11 you don't know, please tell us you don't know.

12 THE WITNESS: Okay.

13 THE COURT: Because you cannot guess or
14 speculate and if you don't know, let us know
15 because you need a foundation. Okay?

16 THE WITNESS: Okay.

17 THE COURT: All right. So do the
18 question again.

19 MR. MANN: Sure. I'll ask it again.

20 THE COURT: Just -- yeah, let's get a
21 better foundation.

22 BY MR. MANN:

23 Q. You said that Ms. Walker made you aware
24 that it was a \$10,000 order?

25 A. Um-hmm.

1 Q. To your knowledge, why was Ms. Walker
2 telling you this?

3 MS. RINETTI: Objection, speculation,
4 calls for hearsay.

5 THE COURT: It really does. I -- I'm
6 going to sustain that. You need to rephrase it.

7 BY MR. MANN:

8 Q. We'll come back to that.

9 A. Okay.

10 Q. You said that Cameron helped you?

11 A. Yes, sir.

12 Q. And how would he help you?

13 A. He would empty out the boxes with me.
14 On the invoices, he would tell me what certain
15 descriptions were of the items and show me, you
16 know, if I said, what is this item, he would say,
17 oh, that's these.

18 He helped me in counting the -- the
19 items, moving them to the correct classrooms,
20 taking them to the storage upstairs. Um, he was
21 100 percent just right there. He knew the
22 business, and at that time, I had only been a
23 parent.

24 Q. Now, did you work set times or when
25 would you work on this?

1 A. I typically went in between 10:00 2:00.
2 And then there were times where my daughter would
3 get out of her preschool, because she was enrolled
4 in a summer camp. I would pick them up down the
5 street and then they would come back with me. And
6 so then we would work until the evening times, too.

7 Q. So your daughter was enrolled in another
8 facility?

9 A. Yes, sir.

10 Q. Why was that?

11 A. My daughter had gone. My older
12 daughter, Isabella was going to private school at
13 Corner Stone Christian Academy and in order for the
14 children to go into, into the next levels, they
15 had, um, I had started my other daughter Alexandria
16 there, too.

17 And also, too, I had taken my kids out
18 of Kids 'R' Kids for a short period of time.

19 Q. Okay. So is it fair to say that in
20 order for your daughter to continue at the private
21 school, she had to continue going there
22 consistently?

23 A. Yes.

24 Q. And then you said you took your kids out
25 of Kids 'R' Kids?

1 A. Um-hmm.

2 Q. Do you remember when that was?

3 A. I don't remember a specific date, no.
4 I'm sorry.

5 Q. Do you remember why you took them out of
6 Kids 'R' Kids?

7 A. I do. I had an issue with Kashonda
8 Williams while she was working there.

9 Q. We'll just go ahead and stop there. And
10 why was it that you came back to Kids 'R' Kids?

11 A. Well, Sheila had asked me to come in and
12 help with the inventory and I also knew that --
13 that Kashonda was going to be leaving and I was
14 looking for work and so they had asked me if I
15 would come in and help and eventually take on a
16 position at Kids 'R' Kids.

17 Q. And in August, what position did you
18 take?

19 A. Originally, I was hired as their pre K
20 teacher. I held that position for one week.
21 Kashonda turned in her notice and I was given the
22 position of curriculum coordinator.

23 Q. Curriculum coordinator?

24 A. Yes.

25 Q. And what did that entail?

1 A. Going into the classrooms, making sure
2 the teachers were doing what they needed to on the
3 learning front. Making sure that they were
4 following the curriculum, that if they had any
5 questions, I was to provide training for them.

6 And to keep track of all of, like, all
7 of the products that were within the classroom, all
8 the supplies.

9 Q. Now, so it's fair to say that you were
10 constantly moving around the facility?

11 A. Yes, correct.

12 Q. In your position as curriculum
13 coordinator, were you able to observe Cameron
14 interact with the kids?

15 A. Yes.

16 Q. In your observations of Cameron,
17 anything ever cause you any concern?

18 A. No.

19 Q. Was there anything that he did that
20 thought was inappropriate?

21 A. No.

22 Q. To your knowledge, did he ever hurt a
23 child?

24 A. No.

25 Q. Did he ever show any particular favor to

1 a certain child that caused you concern?

2 A. No.

3 Q. How was he with the kids?

4 A. He was always very professional with
5 them. He -- he was always very friendly, very kind
6 to them. And he was always working more with the
7 teachers and kind of showing the teachers and
8 showing myself how to -- how to have appropriate
9 interactions, how to do proper teaching.

10 How to create a more cohesive classroom,
11 in order for the day to run smoother and for more
12 learning to get done.

13 Q. Did you feel that he was there to
14 enhance everybody else's abilities?

15 A. Yes, very, much so.

16 Q. Did you ever feel that he was only there
17 for his own interest?

18 A. Absolutely not.

19 Q. How was he with the adults?

20 A. Very professional. Um, he was always
21 there wanting -- um, wanting us to learn more. Um,
22 he prided himself on his own education, and he felt
23 that it was always good for us to -- to have more
24 knowledge within the field.

25 And if there were any times that we were

1 uncertain about things, he was always right there
2 to let us know, um, and if he didn't have answers,
3 then he would go into the field with his different
4 resources and he would find answers for us to help
5 with the development of the child.

6 Q. What does that mean, "into the field
7 with different resources?"

8 A. The Nevada registry provides classes and
9 so they have different trainers. He'd gone through
10 different classes and so he would reach out to
11 people that he knew were trainers.

12 If it was questions in regards to
13 policies or procedures, he would call corporate
14 offices. If it was questions about, you know,
15 regulations, he would reach out to licensing and he
16 would talk with licensing or the health department
17 and get answers for us.

18 Q. Now, did you ever socialize with Cameron
19 and his family outside of work?

20 A. I did.

21 Q. Was this just you or you and your
22 family?

23 A. No, it was me and my family.

24 Q. So the six of you?

25 A. Yes.

1 Q. How often would you guys get together?

2 A. When I first met Cameron, it was more so
3 like birthday parties. After I started working at
4 Kids 'R' Kids and our friendship developed more, we
5 spent a lot of time together, our families did. We
6 would have family dinners. I would go over to his
7 house. His family would come over to our house.
8 Christmastime we'd bake cookies together, so it was
9 quite often.

10 Q. Now, when you guys would socialize,
11 would it just be your family and his family or
12 would it be more than that?

13 A. It depended on what the circumstances
14 were. Birthday parties it would be more of us.
15 But there were a lot of times where they came over
16 for family dinners and we went over there.

17 Q. When you would socialize with Cameron,
18 was there ever times that you'd notice he just
19 disappear for long periods of time?

20 A. No.

21 Q. Was there any -- was there ever anything
22 about Cameron that caused you concern?

23 A. No.

24 Q. Was there ever a time that the Thomas
25 family would watch your children?

1 A. Yes.

2 Q. How often then would the Thomas family
3 do that?

4 A. I'm not exactly sure. Probably once a
5 month at lease.

6 Q. Once a month?

7 A. Yeah.

8 Q. Why would they watch your children?

9 A. Different events. If my husband and I
10 were, you know, we went out for our anniversary or
11 if there was a wedding we had to go to or if we
12 wanted to have a date night, then they would watch
13 or family, our kids.

14 Q. Was there ever any indication that there
15 was any problems when your kids were staying at the
16 Thomas family?

17 A. No.

18 Q. Do you know, you said that you knew a
19 person by the name of Kashonda Williams?

20 A. Yes.

21 Q. How do you know that person?

22 A. She worked for Kids 'R' Kids.

23 Q. And you said that there was a point that
24 you ended up leaving Kids 'R' Kids because of Ms.
25 Williams?

1 A. Correct.

2 Q. And how about April Reed, do you know
3 April Reed?

4 A. I do.

5 Q. And how do you know her?

6 A. She was my daughter's teacher when she
7 was around a year old. Alexandria's.

8 Q. Alexandria's?

9 A. Yes, sir.

10 Q. And did you know April's children,
11 Ambree, Zailey, Zoë or Karter?

12 A. I did. I knew all of them.

13 Q. All four?

14 A. Um-hmm.

15 Q. Now, when you would socialize with the
16 Thomas family, would you see the Reed family there?

17 A. I would.

18 Q. Did that include Ms. Williams?

19 A. It did.

20 Q. Now, you said that you left Kids 'R'
21 Kids because of Ms. Williams.

22 Would you still go over and socialize
23 with Thomas family if Ms. Williams was there?

24 A. For birthday parties and things of that
25 nature, I did, yes.

1 Q. Was there ever a time that you observed
2 a falling out between Ms. Williams and Mr. Thomas?

3 A. Yes.

4 Q. When was that?

5 A. It was December 11th of 2009, I believe.

6 Q. Now, you say December 11th of 2009.

7 That seems very specific.

8 How do you remember that date?

9 A. It was my husband's birthday and we were
10 having a play at the school for a holiday program
11 and it was that evening that they had had a falling
12 out.

13 Q. Was this falling out kind of a private
14 falling out between Cameron or Kay? I guess my
15 question --

16 A. Yeah -- I'm sorry.

17 Q. How did you know about this fight?

18 A. Kay needed to pay a bill --

19 MS. RINETTI: Objection. Hearsay.

20 MR. MANN: I'm asking how you knew about
21 it. How did you know --

22 THE COURT: How did you know about it.

23 Not --

24 THE WITNESS: I can go ahead and answer
25 it.

1 THE COURT: Well, I guess as long as
2 you're not relying on outside conversations.

3 THE WITNESS: No. No, I'm not.

4 BY MR. MANN:

5 Q. So Jolyn, just to make sure -- Ms.
6 Welch, just to make sure, we don't want to know
7 what someone else said.

8 A. Okay.

9 Q. We only want to know what you know.

10 A. Okay.

11 Q. Okay. So how did you know that there
12 was a fight?

13 A. Because I was standing in an office, um,
14 and Cameron needed to go pay a bill that was --

15 MS. RINETTI: Objection. Calls for
16 hearsay. She can be present but what happened is
17 outside the scope --

18 THE WITNESS: Okay.

19 BY MR. MANN:

20 Q. So tell me what you observed, not what
21 you --

22 THE COURT: That's a better way. What
23 did you observe when you were standing in the
24 office?

25 THE WITNESS: Cameron was on the

1 telephone. He was very upset. Afterwards he had a
2 conversation with Bonnie Hart in the office.

3 BY MR. MANN:

4 Q. Okay. And when he had that
5 conversation, without telling me any of the details
6 of that conversation --

7 A. Okay.

8 Q. -- what was his demeanor?

9 A. Very upset. Very, um, he was very hurt.
10 He was angry, and just flustered. He wasn't happy
11 at the moment.

12 Q. From that point, did he stay there or
13 did he leave?

14 A. He had to leave Kids 'R' Kids for a
15 little bit.

16 Q. And did you hear about this fight after
17 that day?

18 A. I did.

19 Q. Was this an ongoing discussion after
20 that time?

21 MS. RINETTI: Objection. Hearsay.

22 MR. MANN: I'm not asking what was said.
23 I'm asking if it was --

24 THE COURT: Well, you preface it what
25 was -- they were talking about and then an ongoing

1 discussion. So that is exactly what we're doing.

2 So I'm going to sustain the objection.

3 BY MR. MANN:

4 Q. Did you ever observe any sort of
5 interaction between April and Cameron?

6 A. Yes.

7 Q. And back in December of 2009, did you
8 observe any sort of heated discussions between
9 them?

10 A. No.

11 Q. Did you get any sense that -- of their
12 relationship in December of 2009?

13 MS. RINETTI: Objection. I'm going to
14 -- lack of foundation. She hasn't witnessed
15 anything. I just don't know her basis of
16 knowledge.

17 THE COURT: The question was did you
18 get -- I'm sorry -- any sense --

19 MR. MANN: Any sense of how their
20 relationship was?

21 I'll add a little more foundation, Your
22 Honor.

23 THE COURT: You knew where I was going.
24 I need a little foundation. I have no idea what
25 she knows about April Reed, et cetera. So I'm

1 going to sustain the objection until we can get
2 some foundation.

3 BY MR. MANN:

4 Q. In December of 2009, did you have
5 interactions with Ms. Reed?

6 A. No.

7 Q. In January of 2009, did you have any
8 interaction -- I'm sorry -- 2010, any interactions
9 with Ms. Reed?

10 A. No.

11 Q. When Mr. Thomas was arrested, did you
12 still work at Kids 'R' Kids?

13 A. I did.

14 Q. And when he was arrested, was there a
15 lot of news media around?

16 A. There was.

17 Q. Explain that to me.

18 A. The news crews had come onto the
19 property. We told them that they could not be. So
20 they were across the street and they were, you
21 know, videoing the front of the building. They
22 were on the sides.

23 As parents were driving off of our
24 property, they would stop them. But they were --
25 they were there.

1 Q. And so is it fair to say that everybody
2 knew the news media was there?

3 A. Yes.

4 Q. Do you feel like you know Cameron as a
5 person?

6 A. I do.

7 Q. And what do you think of him as person?

8 A. I think he's amazing. I think he's a
9 wonderful father. He was a great boss. He's an
10 awesome friend and I hold him very dear in my
11 heart.

12 Q. Did you ever know him to ever hurt a
13 child?

14 A. No, sir.

15 MR. MANN: I'll pas the witness.

16 THE COURT: Okay. Cross-exam.

17

18 CROSS-EXAMINATION

19 BY MS. RINETTI:

20 Q. Good afternoon. I'm Dena Rinetti --

21 A. Hi.

22 Q. -- with the district attorney's office.
23 I'm going to ask you a couple of
24 questions. Okay?

25 A. Okay.

1 Q. You came in here and you said you were a
2 bit nervous?

3 A. Yeah.

4 Q. Okay. Nervous because we're in front of
5 a bunch of people having to talk?

6 A. Yeah. I've never been in a courtroom
7 before. Well, one time I was but never up here.
8 So this is different for me.

9 Q. Kind of a different experience?

10 A. Yeah.

11 Q. A little nerve-wracking?

12 A. Not knowing what to expect, yeah.

13 Q. Exactly, right?

14 A. Yeah.

15 Q. All right. You mentioned that you
16 started your employment with Kids 'R' Kids in
17 August of 2009, correct?

18 A. Yes.

19 Q. When did you start volunteering for Kids
20 'R' Kids?

21 A. Oh, jeez. Off and on since my daughter
22 was probably -- my oldest daughter was probably
23 three years old.

24 Q. So she's 13 now.

25 A. Yeah. So 10 --

1 Q. 2006ish?

2 A. Yeah. 2005, 2006.

3 Q. Okay. And you mentioned that while you
4 volunteered, you -- in June of 2009, you helped
5 with a -- a rather large supply order?

6 A. Yes.

7 Q. And that happened over a course of I
8 think you said two months?

9 A. Um-hmm.

10 Q. Is that a yes?

11 A. Yes.

12 Q. Sorry. The lady --

13 A. I'm so sorry.

14 Q. -- behind you is trying to --

15 A. Yes. Sorry.

16 Q. -- is typing everything.

17 And during those two months, you said
18 did you work everyday on the supply order?

19 A. I don't recall if it was everyday.

20 Q. So you don't know which days you came
21 in, which days you came a little later from the
22 summer camp, things like that?

23 A. Specifically which days, no.

24 Q. Okay. Fair enough. You mentioned that
25 during your volunteer work and then ultimately with

1 your employment in Kids 'R' Kids, you were able to
2 see the defendant, Mr. Thomas, interact with
3 children?

4 A. Yes, ma'am.

5 Q. And you would see other teachers
6 interact with children?

7 A. Yes, ma'am.

8 Q. Was it unusual for children to sit on
9 teachers laps?

10 A. No, ma'am.

11 Q. Okay. So it wouldn't have been out of
12 the ordinary for a child to be sitting on the
13 defendant's lap?

14 A. No.

15 Q. Did you ever observe a child on Mr.
16 Thomas' lap?

17 A. No, not that I recall.

18 Q. Did you see other kids on other
19 teachers' laps other than Mr. Thomas?

20 A. During my employment there, yes.

21 Q. How about your volunteer work?

22 A. Um, I don't recall. I mainly stayed
23 within that classroom during -- during that first
24 month.

25 Q. You mentioned that the defendant would

1 baby-sit your children on occasion?

2 A. Yes, ma'am.

3 Q. And for special events and things like
4 that?

5 A. Yes, ma'am.

6 Q. Did he do it for free?

7 A. Sometimes, yes. Originally, no. After
8 our friendship developed, yes.

9 Q. When he would babysit your children,
10 would there be other children other than the
11 defendant's children present?

12 A. Sometimes.

13 Q. Do you remember what children would be
14 present?

15 A. Different family friends. I know that
16 the Reed children were there a few times.

17 Q. So you saw the Reed children, meaning
18 Zailey, Zoë, Ambree and Zailey?

19 A. And Karter, yes.

20 Q. And Karter. Okay. She's the last one,
21 I know.

22 A. Yeah. Sorry.

23 Q. Did you ever see what the kids would do
24 when you dropped off the kids for babysitting; what
25 they would do at the defendant's house?

1 A. Um, no. I mean, after I left, I wasn't
2 there to observe it. I'm sorry.

3 Q. No. I didn't know if you stayed for a
4 bit and kind of --

5 A. Sometimes. The kids would -- the kids
6 were typically playing. They had a different area
7 where the kids would be playing downstairs and the
8 adults would, kind of, hang out in the area.

9 Q. Did the kids ever play upstairs as well?

10 A. I don't know. I'm sorry.

11 Q. No. It's okay. Did you ever have your
12 kids spend the night?

13 A. I did.

14 Q. Okay. How often would they spend the
15 night at defendant's house?

16 A. I don't recall exactly how many times,
17 but if wasn't -- I mean, it was typical if they
18 were baby-sitting and we were going to be out late,
19 that the kids would stay there.

20 Q. Let's say on a given month, how many
21 times would your children stay the night at the
22 defendant's house?

23 A. Probably once.

24 Q. Once. Okay. Do you know whether or not
25 other children would be babysat by the defendant

1 when your children were spending the night?

2 A. If they were being babysat, no.

3 Q. Do you know what kind of activities your
4 children would do when they were being baby-sat by
5 the defendant?

6 A. I mean, I know what my children have
7 told me they've done. Is that okay to --

8 Q. But you never observed anything?

9 A. No, I wasn't there to see it. I'm
10 sorry.

11 Q. Do you know if your children ever
12 watched cartoons with the defendant?

13 A. I mean, they've told me they have, yeah,
14 with the other kids.

15 Q. With the other kids?

16 A. Yeah.

17 Q. Okay. All of them in a big group.
18 Okay.

19 You mentioned during your employment
20 that you had obviously disagreement for a short
21 period of time with management and then you
22 eventually came back.

23 Are you aware of a woman by the name of
24 Rachel Keach?

25 A. I am.

1 Q. And her daughter, Sidney Keach?

2 A. I am.

3 MS. RINETTI: Nothing further.

4 THE COURT: Okay. Redirect.

5 MR. MANN: Pass, Your Honor.

6 THE COURT: All right. Are there any
7 juror questions? Okay.

8 Ma'am, we just need your juror number.

9 JUROR NO. 491: 491 or 11.

10 THE COURT: I'm going to add it to your
11 note, okay? So I can have a complete record.
12 Thank you.

13 (Whereupon there was a conference at the bench that
14 was not requested to be reported.)

15 THE COURT: Okay. I'm going to ask you
16 a question jurors get to ask, and then answer under
17 oath, the same as if they were asking it, and then
18 they may be able to follow up. It just depends.

19 THE WITNESS: Okay.

20 THE COURT: Did you ask your daughters
21 any questions concerning Mr. Thomas after he was
22 arrested such as touching?

23 THE WITNESS: Yes.

24 THE COURT: All right. Any followup,
25 Mr. Mann?

1 MR. MANN: No, Your Honor.

2 THE COURT: Okay. Any followup?

3

4

DIRECT EXAMINATION

5 BY MS. RINETTI:

6 Q. You mentioned on direct examination that
7 the defendant was honest, caring, a bunch of
8 different adjectives.

9 Knowing that the defendant was caring
10 and loving and all of these things, you still asked
11 your child if they had been touched by the
12 defendant, correct?

13 A. Yes, ma'am.

14 MS. RINETTI: All right. Nothing
15 further.

16 THE COURT: All right. Thank you very
17 much, ma'am.

18 THE WITNESS: Thank you.

19 THE COURT: You're welcome.

20 THE WITNESS: Thank you for having me.

21 THE COURT: You're welcome. You're
22 released.

23 (The witness exited the courtroom.)

24 MR. MANN: Your Honor, may we approach.

25 THE COURT: Sure.

1 (Whereupon there was a conference at the bench that
2 was not requested to be reported.)

3 THE COURT: We're going to just take a
4 brief recess and then another witness is coming but
5 it has been a little bit and we can get the witness
6 here.

7 During this recess, you are admonished:
8 Not to talk or converse among yourselves or with
9 anyone else on any subject connected with this
10 trial; or read, watch or listen to any report of or
11 commentary on the trial or any person connected
12 with this trial by any medium of information
13 including, without limitation, newspapers,
14 television, radio or internet; or form or express
15 any opinion on any subject connected with the trial
16 until the case is finally submitted to you.

17 We'll take our brief recess and then
18 we'll continue with witnesses.

19 THE MARSHAL: All rise for the jury.
20 (The jury exited the courtroom.)

21 THE COURT: All right. Okay. We're
22 outside -- I want to make sure -- we're outside the
23 presence of the jury. Yes.

24 MR. MANN: I just wanted to know what
25 time you wanted us back.

1 THE COURT: You poor thing. It's 2:15.
2 2:40. And how are we doing on jury instructions?
3 How many more witnesses?

4 MR. MANN: This is the last one today,
5 Judge. I apologize. I didn't expect it to go this
6 fast.

7 MS. RINETTI: Well, we can put the
8 defendant on the stand today, just to speed it
9 along so that way we can actually close and
10 deliberate tomorrow. Do the admonishment now.

11 MR. MANN: I would prefer to have him
12 tomorrow and I don't want to break up his testimony
13 either.

14 THE COURT: Let's do this.

15 MR. MANN: Let's see what time we end.

16 THE COURT: That's exactly what I was
17 going to say. Let's see what time we end. We're
18 fine.

19 Do you want me to do the admonishment
20 now?

21 MR. MANN: Yeah. Let's do that.

22 THE COURT: Okay. Hold on and I'll find
23 it. We can do that.

24 (There was a brief on-the-record recess.)

25 THE COURT: Okay. We are outside

1 presence.

2 I'm going to speak to you, Mr. Thomas.
3 So please listen very carefully. It's very
4 important. All right?

5 THE DEFENDANT: Yes, ma'am.

6 THE COURT: Thank you. Mr. Thomas, you
7 have the right under the Constitution of the United
8 States and under the Constitution of the State of
9 Nevada not to be compelled to testify in this case.

10 Do you understand that?

11 THE DEFENDANT: I do.

12 THE COURT: That means no one can make
13 you take the witness stand and make you answer any
14 questions.

15 Do you understand that right, sir?

16 THE DEFENDANT: Yes.

17 THE COURT: You may, if you wish, give
18 up this right and you may take the witness stand
19 and testify.

20 If you do, you will be subject to direct
21 examination by your counsel and subject to
22 cross-examination by the district attorneys.

23 And anything that you say, whether it is
24 in answers to a question put to you by your
25 attorney or by the district attorney, will be the

1 subject of fair comment when the district attorneys
2 speak to the jury in final argument.

3 Do you understand that?

4 THE DEFENDANT: Yes.

5 THE COURT: If you choose not to
6 testify, the Court will not permit the district
7 attorneys to make any comments to the jury
8 concerning the fact that you have not testified.

9 Do you understand that?

10 THE DEFENDANT: Yes.

11 THE COURT: If you elect not to testify,
12 the Court will instruct the jury only if your
13 attorney specifically requests a specific jury
14 instruction, which reads substantially as follows:

15 The law does not compel a defendant in a
16 criminal case to take the stand and testify, and no
17 presumption may be raised and no inference of any
18 kind may be drawn from the failure of a defendant
19 to testify.

20 Do you have any questions that you'd
21 like to ask this Court about or your attorney about
22 your constitutional right?

23 THE DEFENDANT: I do not.

24 THE COURT: If you choose to testify,
25 and you have been convicted of a felony within the

1 past ten years, or have been on parole or probation
2 for a felony within the past ten years, the
3 district attorneys will be permitted to ask you:
4 One, if you have been convicted of a felony; two,
5 what was the felony; and, three, when it happened.
6 No details may be gone into regarding any prior
7 felony convictions.

8 If you deny a felony conviction, the
9 State may impeach your testimony with certified
10 copies of conviction, which may contain more
11 information in them than simply -- than simply what
12 the felony was and when it occurred.

13 Do you understand that?

14 THE DEFENDANT: Yes.

15 THE COURT: Okay.

16 MR. MANN: Thank you, Your Honor.

17 THE COURT: You're welcome.

18 MS. RINETTI: Judge, just for the
19 record, he doesn't have any felony convictions, but
20 based upon the testimony, if he does take the
21 stand, the State intends -- we believe there's bad
22 act information that we'll confront.

23 THE COURT: Okay.

24 MR. MANN: I have not been provide with
25 that information.

1 MS. RINETTI: It's impeachment. Don't
2 need to.

3 THE COURT: Just for the record so we
4 know. All right.

5 Now we can take our break.

6 MR. MANN: Thank you.

7 (Whereupon, a brief recess was taken.)

8 MS. KOLLINS: I sent them to your JEA.

9 MR. MANN: I sent them as well.

10 THE COURT: I was going to ask you that.
11 All right.

12 MR. MANN: And we're pretty close on
13 most of them.

14 THE COURT: That would be great.

15 (The jury entered the courtroom.)

16 THE MARSHAL: Please be seated.

17 THE COURT: Okay. Counsel stipulate to
18 the presence of the jury.

19 MR. MANN: Yes, Your Honor.

20 MS. KOLLINS: Yes, Your Honor.

21 THE COURT: Okay. Mr. Mann, call your
22 next witness.

23 MR. MANN: The defense calls Jennifer
24 Thomas.

25 THE COURT: Okay.

1 (The witness entered the courtroom.)

2 THE CLERK: Please raise your right
3 hand.

4 Whereupon,

5 JENNIFER THOMAS,
6 having been called as a witness, and having been
7 first duly sworn to testify to the truth, was
8 examined and testified as follows:

9 THE WITNESS: Yes.

10 THE CLERK: Thank you. Please be
11 seated.

12 Will you please state your full name --

13 THE WITNESS: Jennifer.

14 THE CLERK: -- and spell your first and
15 last name, for the record.

16 THE WITNESS: Jennifer Thomas.
17 J-e-n-n-i-f-e-r. Last name, Thomas, T-h-o-m-a-s.

18 THE COURT: Okay. Direct exam, Mr.
19 Mann.

20 MR. MANN: Thank you, Your Honor.

21

22 DIRECT EXAMINATION

23 BY MR. MANN:

24 Q. Good afternoon, Jennifer Thomas. How
25 are you?

1 A. Good. How are you?

2 Q. Good. Are you married?

3 A. Yes, I am.

4 Q. And who are you married to?

5 A. Cameron Thomas.

6 Q. Is he in this courtroom?

7 A. He sure is.

8 Q. Can you point to him.

9 A. (The witness complies.)

10 MR. MANN: May the record reflect that
11 she identified Mr. Thomas?

12 THE COURT: Okay. It -- the record
13 shall so reflect.

14 BY MR. MANN:

15 Q. How did you two meet?

16 A. In high school.

17 Q. And was there a time that you guys
18 started dating?

19 A. In high school.

20 Q. What year was that?

21 A. 1999.

22 Q. 1999 you started dating?

23 A. Yes.

24 Q. What year did you graduate from high
25 school?

1 A. 2000.

2 Q. Do you know what year Mr. Thomas
3 graduated from high school?

4 A. Yes, 2002.

5 Q. And how long did you guys date before
6 getting married?

7 A. Five -- five years. Married in 2004.

8 Q. And, um, do you have children?

9 A. Yes. Three beautiful children.

10 Q. What are their names?

11 A. Dontae, Janae and Caylee.

12 Q. And how old are they?

13 A. Caylee is six; Janae is eight; and,
14 Dontae is eleven.

15 Q. And what grade are they in?

16 A. Caylee just graduated from kindergarten.
17 So she's going onto first grade.

18 Q. Congratulations.

19 A. Thank you. Janae will go into fourth
20 grade, and Dontae will be going into seventh grade.

21 Q. Now, when you and Cameron were dating,
22 did you guys at some point live together?

23 A. Yes, we did.

24 Q. And when was that?

25 A. 2002 as well.

1 Q. 2002?

2 A. Correct. After he graduated.

3 Q. And where were you living then?

4 A. In an apartment on Higgins.

5 Q. And how long did you live there?

6 A. Until 2004.

7 Q. And where did you move in 2004?

8 A. Temporarily to his grandmother's house
9 while our house was being built.

10 Q. And did you end up moving into that
11 house that was being built?

12 A. Yes, we did.

13 Q. What is the address of that house?

14 A. 6436 Starling Mesa Street.

15 Q. And when did you move into Starling Mesa
16 Street?

17 A. 2004.

18 Q. Do you know what month?

19 A. I want to say early February, March.

20 Q. Okay. And is the Starling Mesa house,
21 what city is that in?

22 A. In North Las Vegas, Nevada.

23 Q. And how long did you live at that
24 address?

25 A. Until 2009.

1 Q. And where did you move in 2009?

2 A. To 9177 Cantina Creek.

3 Q. You said Cantina Creek?

4 A. Correct.

5 Q. And where was that located?

6 A. In Las Vegas, Nevada.

7 Q. Is there an area of town that Cantina
8 Creek was?

9 A. More southwest, Blue Diamond area.

10 Q. Okay.

11 MR. MANN: May I approach your clerk,
12 Your Honor?

13 THE COURT: Yes. Uh-huh.

14 MR. MANN: Your Honor, may I approach
15 the witness --

16 THE COURT: Yes.

17 MR. MANN: -- with Exhibits A3 to A15?

18 THE COURT: Okay. Exhibit A3 through
19 A15?

20 MR. MANN: Correct.

21 THE COURT: Okay.

22 MS. KOLLINS: No objection.

23 (Whereupon Defendant's Exhibits A3 through A15
24 were marked for identification.)

25 THE COURT: Okay. You have no objection

1 if he moves -- are you going to move them into
2 admission or you want to lay a foundation?

3 MR. MANN: I would like to lay a
4 foundation.

5 THE COURT: That's fine.

6 BY MR. MANN:

7 Q. Ms. Thomas, can you review those
8 pictures? Go through them.

9 A. Sure.

10 Q. Did you review those pictures?

11 A. I did.

12 Q. Do you recognize those pictures?

13 A. I do.

14 Q. How do you recognize those pictures?

15 A. Those are pictures taken at our North
16 Las Vegas house.

17 Q. Is that the Starling Mesa house?

18 A. Yes.

19 MR. MANN: Your Honor, at this time, I'd
20 ask to move in A3 through A15.

21 THE COURT: Okay. My understanding the
22 State has no objection, correct?

23 MS. KOLLINS: I have no objection, Your
24 Honor.

25 THE COURT: Okay. It shall be admitted

1 and that's the Sterling (sic) house?

2 (Whereupon Defendant's Exhibits A3 through A15
3 were admitted.)

4 MR. MANN: Sterling (sic) Mesa, Your
5 Honor.

6 THE COURT: Okay.

7 MR. MANN: Sterling (sic) Mesa.

8 THE WITNESS: Starling.

9 THE COURT: Starling.

10 MR. MANN: May I approach, Your Honor?

11 THE COURT: Yes. Please.

12 BY MR. MANN:

13 Q. Showing you Exhibit -- Defense Exhibit
14 A3.

15 That's the Starling Mesa house?

16 A. Yes.

17 Q. And that's the front of the house?

18 A. Correct.

19 Q. Showing you A5. What is that?

20 A. Dontae's room, our oldest.

21 Q. Now, you said that you lived at the
22 Starling Mesa house from 2004 to 2009?

23 A. Correct.

24 Q. How old was Dontae when you guys lived
25 there?

1 A. Dontae -- I was pregnant when we moved
2 in and he was born in 2004. And then 2009, he was
3 five.

4 Q. 2009 he was five?

5 A. Correct.

6 Q. Showing you A6. Is that another picture
7 of Dontae's room?

8 A. Yes.

9 Q. Showing you A-9, what is that?

10 A. You see the bar that's coming from
11 downstairs to upstairs, and then this big brown is
12 a linen cabinet where we kept blankets, towels,
13 things like that and then that's an open loft.

14 MS. KOLLINS: I'm sorry. What number is
15 that, Mr. Mann?

16 MR. MANN: That would be A9.

17 MS. KOLLINS: Thank you.

18 BY MR. MANN:

19 Q. Showing you A11. What is that a picture
20 of?

21 A. Our downstairs living room.

22 Q. Showing you A13, what --

23 A. Our bedroom.

24 Q. I'm sorry.

25 A. Our bedroom.

1 Q. That's the master bedroom?

2 A. Correct.

3 Q. Showing you A14?

4 A. That's right by the front door. It's a
5 play room.

6 Q. Okay. And showing you A15, what is
7 that?

8 A. Master bedroom as well.

9 Q. Now, there appear to be two people in
10 that room, who are those two people?

11 A. From what I can see, Dontae and Janae.

12 Q. And is that your room?

13 A. Yes.

14 Q. Are you familiar with how the house is
15 laid out?

16 A. Yes, I am.

17 MR. MANN: Your Honor, if I may approach
18 with --

19 THE COURT: Yes.

20 MR. MANN: -- A1 and A2.

21 THE COURT: Yes.

22 BY MR. MANN:

23 Q. Showing you first A1. Can you look at
24 that?

25 A. (The witness complies.)

1 Q. Do you recognize what is described in
2 there?

3 A. Yes.

4 Q. How do you recognize it?

5 A. Because I can see myself going through
6 it, the front door with the toys, our beanbag
7 everything set up.

8 Q. Is it a layout of the house?

9 A. Yes. Well, downstairs.

10 Q. Does it appear to be an accurate layout
11 of the downstairs?

12 A. Yes.

13 MR. MANN: Your Honor, at this time, I
14 would like to move in A1.

15 THE COURT: Okay. Any objection?

16 MS. KOLLINS: No objection, as long as
17 it's to scale.

18 THE COURT: Is it to scale?

19 BY MR. MANN:

20 Q. Is it to scale?

21 A. Yeah.

22 MS. KOLLINS: Just for the record.

23 Thank you. No objection.

24 THE COURT: Admitted.

25 (Whereupon Defendant's Exhibit A1 was admitted.)

1 BY MR. MANN:

2 Q. A2. Showing you A2.

3 What is that a picture of or a
4 description of?

5 A. Our upstairs, the Starling Mesa.

6 Q. Does that appear to be accurate?

7 A. Yes.

8 Q. Okay.

9 MR. MANN: Move in A2, Your Honor.

10 THE COURT: Any objection?

11 MS. KOLLINS: With the same
12 qualification. As long as it's to scale, for the
13 record.

14 BY MR. MANN:

15 Q. Does that appear to be to scale?

16 A. Yes.

17 Q. Okay. Thank you.

18 THE COURT: So it's admitted. Both A1
19 and A2 are admitted.

20 (Whereupon Defendant's Exhibit A2 was admitted.)

21 MS. KOLLINS: Thank you, Your Honor.

22 THE COURT: You're welcome.

23 MR. MANN: Your Honor, if I may
24 approach.

25 THE COURT: That's fine.

1 BY MR. MANN:

2 Q. You said that in 2009, you moved to a
3 location called Cantina Creek?

4 A. Yes.

5 Q. And what kind of house was that?

6 A. Two story.

7 Q. And how long did you guys live at
8 Cantina Creek?

9 A. Until 2011.

10 MR. MANN: May I approach, Your Honor?

11 THE COURT: Yes. Certainly.

12 BY MR. MANN:

13 Q. Showing you Defense Proposed Exhibits B1
14 and B2.

15 Do you recognize those?

16 A. Yes. This is our Cantina Creek. This
17 one is the downstairs and this would be upstairs.

18 Q. Okay. And do these seem to accurately
19 depict the layout of Floor 1 and Floor 2?

20 A. Yes.

21 Q. Okay. And A1 -- I'm sorry. B1 is
22 floor, the bottom floor, the first floor?

23 A. Correct.

24 Q. And B2 is the second floor?

25 A. Correct.

1 Q. And do these appear to be to scale?

2 A. Yes.

3 MR. MANN: Your Honor, at this time, I
4 move in B1 and B2.

5 THE COURT: Any objection?

6 MS. KOLLINS: No objection by the State,
7 Your Honor.

8 THE COURT: Okay. B1 and B2 shall be
9 admitted.

10 (Whereupon Defendant's Exhibits B1 and B2 were
11 admitted.)

12 MR. MANN: Your Honor, may I approach?

13 THE COURT: Yes.

14 MR. MANN: Thank you.

15 BY MR. MANN:

16 Q. Showing you pictures B3 through -- or
17 Defense Proposed Exhibits B3 through B44. Can you
18 just review those, please.

19 A. (The witness complies.)

20 MS. KOLLINS: For the record, the State
21 has no objection to the admission of B3 through B
22 44.

23 THE COURT: B3 through 44?

24 MS. KOLLINS: Through B44, correct.

25 THE COURT: Okay.

1 MR. MANN: Thank you.

2 THE COURT: You're welcome. Are you
3 moving for admission of B3 through 44?

4 MR. MANN: As soon as I get confirmation
5 that she recognizes all those pictures.
6 Absolutely.

7 THE COURT: Okay. All right.

8 BY MR. MANN:

9 Q. Do you recognize all those pictures?

10 A. I do.

11 Q. What are those pictures of?

12 A. Pictures of our house on Cantina Creek.

13 Q. Thank you. And please speak up.

14 A. I apologize.

15 THE COURT: Yes, I'm sorry. I couldn't
16 hear. Cantina Creek?

17 THE WITNESS: Cantina. Yes.

18 THE COURT: Okay. Thank you very much.

19 MR. MANN: At this time, Your Honor, I'd
20 like to move for their admission.

21 THE COURT: No objection. They are
22 admitted.

23 (Whereupon, Exhibits B3 through B44 were admitted.)

24 MR. MANN: Thank you. May I publish?

25 THE COURT: Yes. Absolutely.

1 MR. MANN: Thank you, Your Honor.

2 BY MR. MANN:

3 Q. Showing you B5. What is that a picture
4 of?

5 A. Downstairs at Cantina Creek.

6 Q. And Ms. Thomas, will you please project
7 a little more?

8 A. Absolutely. Our downstairs at Cantina
9 Creek, showing part of our living room and our
10 kitchen.

11 Q. And B6?

12 A. Our kitchen. That's an island in
13 Cantina Creek showing the dining table.

14 Q. And what's this over here (indicating)?

15 A. A fish tank.

16 Q. And B7?

17 A. That's from our kitchen, looking into
18 the kitchen, as well as the living room at Cantina
19 Creek.

20 Q. And B8?

21 A. Our living room in Cantina Creek.

22 Q. B11.

23 A. From the game room and showing my two
24 kids and the stairs going up to the upstairs and
25 the front door is on the left.

1 Q. B12?

2 A. Looks like from the front door, a
3 picture of our game room.

4 Q. You say, "game room." What does that
5 mean, a game room?

6 A. We used it just for that TV for game
7 systems, that's the shelf on the left. You can see
8 our rock band, I think that's called and couches
9 and dog cages.

10 Q. How many dogs did you have?

11 A. Three.

12 Q. And what were the dogs' names?

13 A. Buzz, Woody and Andy.

14 Q. Showing you B16. Do you recognize at
15 that?

16 A. Yes. That's the kids play room.

17 Q. Is that upstairs or downstairs?

18 A. Downstairs. It's in between -- the
19 kitchen would be to the left, and you can see the
20 couch from the game room. So it's kind of, like,
21 behind the game room.

22 Q. Oh, okay. And this picture, I'm going
23 to turn it this way.

24 A. The stairs leading to upstairs.

25 Q. And was it fully enclosed upstairs or

1 was it kind of open at the top.

2 What's this up here (indicating)?

3 A. Right there where you just pointed was
4 where Cameron had his desk, like, an office, but it
5 was all open space. It's more, like, a small
6 landing loft-type of area.

7 MS. KOLLINS: For the record, what
8 number was that? I'm sorry.

9 MR. MANN: I apologize. B17.

10 MS. KOLLINS: Thank you.

11 BY MR. MANN:

12 Q. And B18?

13 A. That's our loft upstairs as soon as you
14 walk up the stairs.

15 Q. And what is that in the loft?

16 A. A Bowflex and an elliptical or an
17 exercise bike in the back. I just see the chair.
18 So exercise bike.

19 Q. Showing you B20?

20 A. Dontae's room.

21 Q. And when you moved into Cantina Creek,
22 how old was Dontae?

23 A. Five.

24 Q. Five. Showing you B22.

25 A. Dontae's room as well.

1 Q. And Dontae had a TV in his room?

2 A. He did.

3 Q. Do you know how big that TV is?

4 A. I will guess at 32 inches.

5 Q. Would Dontae be allowed to watch things
6 on that?

7 A. Yes. Not on a school night but on a
8 weekend, yes.

9 Q. Is that something he could do himself?

10 A. Yeah. By that age.

11 Q. Showing you B23?

12 A. It's in the loft, looking down the
13 hallway.

14 Q. And where is Cameron's desk that you
15 talked about in relation to that?

16 A. Behind the guinea pig cage. So right
17 there, there was a guinea pig and you can see the
18 chair, like, right after the gate. You can see
19 that brown --

20 Q. Okay. And showing you B24?

21 A. That's his office space or open land.

22 Q. And B27?

23 A. That's our princess Janae's room.

24 Q. B29?

25 A. Janae's room as well.

1 Q. And is that a TV in her room?

2 A. Yes.

3 Q. Was she able to watch the TV in that
4 room?

5 A. She was.

6 Q. Showing you B35. Where is that from?

7 A. It could either be from the hallway or
8 from, like, his office area. It was upstairs.

9 Q. Is that a picture of the upstairs?

10 A. No. It's from upstairs, taken upstairs
11 looking down onto the game room.

12 Q. And showing you B36?

13 A. Master bedroom.

14 Q. B37?

15 A. Master bedroom as well.

16 Q. And B38?

17 A. Master bathroom.

18 Q. Showing you B40?

19 A. Master bedroom.

20 Q. Thank you. When you lived at Cantina
21 Creek, who lived there with you?

22 A. When we moved in?

23 Q. Yes.

24 A. Myself, Cameron and our two kids at that
25 time.

1 Q. And, um, at some point that you lived in
2 Cantina Creek, did you have a third child?

3 A. I did in 2010.

4 Q. What was, what was family life like with
5 Cameron?

6 A. Amazing.

7 Q. Would you have a lot of family around?

8 A. Absolutely.

9 Q. What about friends?

10 A. Absolutely.

11 Q. Was it important for you to be around
12 friends and family?

13 A. Very importance.

14 Q. Why?

15 A. Um, my mom passed away at a young age
16 and so I had family that weren't biological, raised
17 myself and my sister.

18 And it's a huge deal for us because we
19 were so close to our mom and my dad passed -- well,
20 my mom passed away but my dad really didn't take a
21 value in my life at that point.

22 And so having family that weren't blood
23 related raise me and literally make us one of their
24 own, it made us closer and accept what we're going
25 through.

1 So when Cameron and I got together, it
2 was always around family, whether it was in high
3 school or whether it was dinners.

4 We used to have Sunday dinners at my
5 parents every Sunday. It's always about family.

6 Q. When you say, "family," you don't
7 necessarily mean biological; is that what you're
8 saying?

9 A. No. My dad that's in the courtroom
10 raised me since I was 15.

11 Q. And did Cameron agree with this
12 philosophy?

13 A. Absolutely. He had the same experience.
14 He had --

15 MS. KOLLINS: Objection. Your Honor,
16 I'm going to object. May we approach?

17 THE COURT: Yes.

18 (Whereupon there was a conference at the bench that
19 was not requested to be reported.)

20 BY MR. MANN:

21 Q. Ms. Thomas, it's fair to say that family
22 was important to both you and Cameron?

23 A. Absolutely.

24 Q. And family included biological and
25 friends?

1 A. Yes.

2 Q. And how was Cameron's toward others?

3 A. Very kind, very genuine, very
4 thoughtful. Very -- like a brother, you know. Um,
5 he became friends with somebody whether it's joking
6 or whether it's just knowing them on sports. It
7 doesn't matter how the conversation started, it
8 just became very natural to be attracted to his
9 personality.

10 He would make you laugh, even when he
11 didn't want to and amazing.

12 Q. And was there always something going on
13 at your house?

14 A. As far as.

15 Q. Events, people over, things like that?

16 A. I would say on a regular, absolutely.
17 We had, well, in both houses, we had family over,
18 whether it's my sister or whether it's a birthday
19 party or whether it's just a lot of -- we had
20 several friends, very close friends that we would
21 see almost every weekend that would come over or
22 we'd be at their house just playing.

23 You saw one of the pictures, playing
24 video games or watching a movie or doing a potluck
25 or barbecue. You can't sit in the house all day so

1 we brought everybody to one house.

2 Q. Do you know someone by the name of
3 Kashonda Williams?

4 A. Yes, I do.

5 Q. And how do you know her?

6 A. We met in high school and we were
7 friends.

8 Q. Did she go to your high school?

9 A. Yes.

10 Q. Okay. And do you know about what time
11 you first met her?

12 A. Same time period, about 1999.

13 Q. And do you know in what context you met
14 her?

15 A. Yes. I was in the orchestra when I was
16 in high school and she was in choir in high school.

17 Q. Did you meet her through Cameron?

18 A. No.

19 Q. And do you know a person by the name of
20 April Reed?

21 A. Yes, I do.

22 Q. How do you know her?

23 A. I met her at the day care because she
24 became working at the day care, at Kids 'R' Kids
25 and then later on dated Kashonda Williams.

1 Q. And do you remember when about you met
2 her?

3 A. I want to say late 2005.

4 Q. Okay. And um, do you know if April had
5 children?

6 A. When I met her, she had three and was
7 pregnant with her fourth.

8 Q. And do you know the children's name?

9 A. Yes, I do.

10 Q. What are their names?

11 A. Ambree, Zailey, Zoë, and Karter.

12 Q. And was your family close with the Reed
13 family?

14 A. After a while, yes.

15 Q. How close were they to your family?

16 A. Depends on the time period. In the very
17 beginning, we just got know them and saw them here
18 and there. And then the more serious Kashonda and
19 April's relationship got, the more they were
20 invited over for birthdays or barbecues, and it
21 progressed from there.

22 Q. Would they come and stay the night with
23 you guys?

24 A. Yes, they would.

25 Q. To your knowledge, was Cameron named the

1 Reed children's God dad?

2 A. Yes.

3 Q. What does what mean, "God dad"?

4 A. It really shows that you're taking an
5 interest in the child, not just religious, but in
6 their well being.

7 To us, it meant that if something were
8 to happen to the parents, that he would step in and
9 be that parent role. God forbid there's a horrible
10 car accident, you know, we all need a plan when we
11 have children, and that was a big thing. They
12 never had a male role model and so Godfather worked
13 very well.

14 Q. And Cameron being the God dad or
15 Godfather, did that obligate you as his wife?

16 A. Well, it was something that we discussed
17 before committing, and of course. Because God
18 forbid somebody's in a car accident, I would need
19 to help raise or have a part in raising these
20 children, which I completely understood.

21 Q. So it wasn't a name that you took
22 lightly?

23 A. Oh, absolutely not. That was actually a
24 big deal in our family.

25 Q. And do you remember how it came about

1 that Cameron became the God dad to April's kids?

2 A. Well, it was pretty emotional when she
3 had her baby, Karter. And we were in -- at the
4 hospital, you know, everybody runs and it's just an
5 emotional thing when a child's born. And at that
6 time, you really kind of think and look back on
7 well, who do I trust? Who did I really care about
8 enough to be able to say this precious baby is
9 going to be taken care of.

10 And that's when it really started is
11 when Karter was born. And it's like, okay, if
12 you're going to take this responsibility, we've
13 always been -- you know. My sister, we never were
14 split up. So that was a big thing to them as well
15 is if they have four children, you can't just say
16 you're going to take care of one and not the other
17 three. So what would happen.

18 So we talked about it and we agreed that
19 he would be their Godfather and it's a big
20 commitment. It's not just financial. It's
21 emotional as well and I commend him for wanting to
22 do that for somebody.

23 Q. What kinds of things would you and
24 Cameron do for those girls, as his God -- as he was
25 their Godfather?

1 A. Pretty much everything aside from
2 day-to-day. What I mean by that is we were at
3 every event, every graduation, every birthday,
4 every honor roll, every certificate.

5 We were there for the homework projects,
6 Donuts with dad. I mean, anything that related to
7 being a part of that child's every day life is what
8 we were there for.

9 Q. Would the girls request things of you
10 and Cameron?

11 A. Not things but more presence. So like I
12 said, if --

13 Q. Presence as in your appearance?

14 A. Correct.

15 Q. Okay. I just wanted to --

16 A. So if -- if let's say an award. My
17 daughter just had kindergarten graduation. So
18 that's what makes me think of that. Then it was
19 family; everybody got a phone call. Everybody was
20 there and you should be there to support the kid.

21 Q. And so what were the expectations then
22 of Cameron as God dad?

23 A. To be consistent. You know, if you're
24 going to take on this role and they're going to
25 call you Godfather, you need to be consistent. You

1 need to be there for their upbringing, their
2 wrongs, their rights. You can't, when they get in
3 trouble, walk out the door.

4 It's -- you have to be consistent. It's
5 like -- it's not the same as your own children, of
6 course, because you're with your children seven
7 days a week, 24 hours a day. But you're with them
8 through the ups and downs.

9 Q. And to your knowledge, did Cameron take
10 this responsibility seriously?

11 A. Absolutely.

12 Q. Now, who's in charge of finances in your
13 house?

14 A. Cameron.

15 Q. Do you guys have a joint checking
16 account?

17 A. We do.

18 Q. Would you know what was going on with
19 the finances?

20 A. Absolutely. I'm a banker.

21 Q. You're a banker?

22 A. Um-hmm.

23 Q. Where do you work?

24 A. Bank of America.

25 Q. How long have you worked there?

1 A. 15 going on 16 years.

2 Q. And what do you do for Bank of America?

3 A. Right now I'm a CSSO, client, sales and
4 service officer.

5 Q. I'm sorry. CSSO?

6 A. Correct.

7 Q. What is that?

8 A. A client, sales and service officer
9 helps a certain clientele with everything from
10 opening accounts, to trusts, to investments,
11 anything that has to do with personal finances.

12 Q. And so being a banker, you're still
13 involved in the finances of the family?

14 A. Absolutely.

15 Q. Did you know if Cameron was spending
16 money?

17 A. Absolutely.

18 Q. Did Cameron know if you were spending
19 money?

20 A. Absolutely.

21 Q. Now, you talked about all these
22 different celebrations. And with Cameron being God
23 dad, would you and Cameron give lots of gifts to
24 the girls?

25 A. Depends on the celebration. Christmas

1 was really big in our household. Anything
2 monumental. So graduations or, like I said,
3 Kindergarten graduation, fifth grade graduation,
4 anything that would warrant a gift.

5 Q. And was the gift just from Cameron or
6 from both of you?

7 A. Both of us.

8 Q. Would you discuss the gifts before they
9 were given?

10 A. Yes.

11 Q. Did you ever think that any of the gifts
12 that you were giving were too lavish?

13 A. No.

14 Q. Were the gifts, in your opinion,
15 appropriate for the age of the child?

16 A. Yes.

17 Q. Did Cameron ever seem to favor certain
18 gifts for certain children?

19 A. No.

20 Q. Was Cameron a God dad to more than those
21 four girls?

22 A. Yes, he was.

23 Q. Who else was he a God dad to?

24 A. To my -- his sister, her daughter,
25 Kegan; two friends of ours, Gina and Daniel's

1 children, Elijah (phonetic); and, Alona (phonetic),
2 someone else. He ended up being Godfather to my
3 niece, Jailyn (phonetic).

4 Q. And did he take those responsibilities
5 for those four other kids the same way that he did
6 for the Reed children?

7 A. Absolutely.

8 Q. Now, let's talk a little bit about your
9 house.

10 A. Okay.

11 Q. And how it functioned. Who would do
12 chores around the house?

13 A. I would.

14 Q. Would anyone else do chores around the
15 house?

16 A. Depends on the chore.

17 Q. So when you said you would do chores,
18 was that meaning that you were responsible mainly
19 for the upkeep of the house?

20 A. 99 percent.

21 Q. Okay. So what kind of chores would
22 Cameron do?

23 A. Take out the trash; he would do, like,
24 replace the air ducts, you know, the vents or
25 whatever they were called, anything car related,

1 not necessarily household. Anything electronic,
2 like, if there was something wrong with the cable
3 box, that's not my area. But as far as cleaning,
4 cooking, laundry, dishes. I mean, even spraying
5 down the patio was me.

6 Q. So you mentioned laundry. Who would be
7 responsible for the laundry?

8 A. I would.

9 Q. Have you ever known Cameron, between the
10 years of 2006 to 2011, to do laundry?

11 A. No.

12 Q. Why are you laughing?

13 A. Because he would say he's allergic to
14 laundry.

15 Q. Now, it sounds like too good a gig to be
16 true, a husband that didn't have to do many chores.
17 Why is that?

18 A. I'm learning this and -- um, it's just,
19 you know, I was -- moved out on my own. I mean, I
20 had a -- shared an apartment with my sister. So we
21 did our own things. We cleaned up on -- after
22 ourselves.

23 Then we moved in together and I still
24 cleaned up after myself, it was just one extra
25 plate and it just progressed from there. It wasn't

1 anything that I didn't already do. I was already
2 doing it.

3 Q. Other than the chores around the house,
4 what would he do to help out?

5 A. He'd help with the pick up. So, like,
6 if Dontae was playing in the playroom and there was
7 a colossal mess, he would say, okay, time to sing a
8 song and put the toys in the bucket.

9 We used to have a clean up song in our
10 house, so he'd get them all excited and responsible
11 and get them motivated to do that.

12 Q. Who was the primary person responsible
13 for the care of the children?

14 A. Like, back and forth from day care or --

15 Q. Let's start with that.

16 A. Back and forth from day care, Cameron
17 because he worked at a day care. I would be more
18 so, you know, cutting their meat, getting plates
19 ready, picking out clothes, bath time.

20 Q. So he would help with the transportation
21 chore of the kids and you would do other items
22 regarding the kids?

23 A. Right. And each day was different. You
24 know, if I had a bigger mess to clean up, he would
25 help more with the kids and vice versa.

1 Q. Now, if one of the children were sick,
2 who would stay home from work?

3 A. I would.

4 Q. Why would you stay home from work and
5 not him?

6 A. My work was more flexible. I could have
7 sick time that I never used unless it was for the
8 kids and kids are sick, they want their moms. And
9 he would work at a day care so it would be hard
10 because he'd try to multitask and okay, come on
11 Dontae, it's okay.

12 Let's just finish this or let's make
13 sure everybody's set. He always would want to
14 leave work perfect, you know, like, nothing. It
15 was just easier for us.

16 Q. Now, back in 2009, you worked at Bank of
17 America?

18 A. Yes.

19 Q. During your career at Bank of America,
20 would you have to go in on Saturdays?

21 A. Yes, I would.

22 Q. And do you know how often that would
23 happen?

24 A. It would fluctuate, depending on what's
25 going on with the bank. There's times that I would

1 work one Saturday a month, there's times that I
2 would work all four. There's times it would be two
3 on, two off. It just depends on what was going on.

4 I was in management for a long time, so
5 if somebody called out, it was me.

6 Q. Now in 2009, 2010, do you know if you
7 were working a lot of Saturdays or not?

8 A. I couldn't tell you, it was
9 inconsistent.

10 Q. Now, back in 2006 to 2010, um, where
11 would your kids go on a typical workday?

12 A. Um, with Cameron.

13 Q. And where was that?

14 A. Well, 2006 would have been at Kids R'
15 Kids and 2010 would have been at Bright Child.

16 Q. So 2006 to some part in 2009, 2010?

17 A. Correct. 2009 more so.

18 Q. Kids 'R' Kids and then 2010, you said it
19 was Bright Child?

20 A. Correct.

21 Q. How would they get home from day care?

22 A. Cameron as well.

23 Q. Would there ever be a time that you
24 would drive the kids home?

25 A. Depending on what's going on with work

1 for him. So I remember monthly meetings he would
2 have, like, once a month staying until 7:00 or 7:30
3 at night. And I knew in advance when I had to pick
4 up the kids so he could -- it was just staff that
5 was there, no children.

6 So I take them home there. When he
7 became a director, he put in a lot time and so if I
8 knew he was staying late, I would pick them up but
9 it was few and far between.

10 Q. So when he was at Kids 'R' Kids and was
11 the assistant director, it was about once a month
12 that you would have to go and pick them up?

13 A. Correct.

14 Q. But when he became the director of
15 Bright Child, you would have to pick them up a
16 little more frequently?

17 A. Just because he was trying to put the
18 school together and it still wasn't as often but if
19 I was on my way home, our house versus Bright Child
20 was maybe a five to seven minute drive. It was
21 very close. So if I was on my way home and I knew
22 he wanted to stay late, I would pick up the kids.

23 Q. Now, back 2008 to 2010, can you ever
24 think of a time that you would ask April or Kay to
25 drive your children home from day care?

1 A. I can't.

2 Q. Why?

3 A. Primary reason is they smoked in their
4 cars and I was totally against that, any secondhand
5 smoke for my kids. Another reason would be there's
6 no reason for them because Cameron would take them
7 to work, he would bring them home from work.

8 I can't think of a time that they would
9 have needed to be picked up by somebody else, other
10 than me or him.

11 Q. Now, when you guys started becoming
12 close with April, Kay and the kids, would they stay
13 over for Friday nights?

14 A. Yeah. Friday or Sat- -- I mean, over
15 the weekend, yeah.

16 Q. And how often do you think this would
17 happen?

18 A. Depends on what was going on. In, I
19 want to say the first two years, they had a rough
20 living situation where we had a large house and an
21 open room, so if they ended up staying late, then
22 sometimes they would just stay the night, depending
23 on what was going on.

24 Q. Now, this may seem like an odd question,
25 but do you and Cameron sleep in the same bed?

1 A. We do.

2 Q. Typically, what time would you get up on
3 Saturday morning?

4 A. Depends on what was happening on
5 Saturday morning.

6 Q. Okay. So if it was a morning that you
7 did not work, what time would you get up?

8 A. When the baby woke up.

9 Q. Okay. And that baby would be Janae,
10 Caylee?

11 A. Yeah. So it would fluctuate so
12 depending, our kids -- they were good. We never
13 made it past 9:00 though. We always wanted double
14 digits and never got it.

15 Q. And when you would wake up in the
16 morning, who was up?

17 A. On a typical Saturday morning that I'm
18 not working would be myself, Cameron and the kids
19 and then if we had guests.

20 Q. Would Cameron be up before you or sleep
21 in, what's his typical behavior?

22 A. He would normally go get the baby or the
23 kid. So Dontae, even when he was a toddler would
24 yell for somebody to go get him out of his bedroom.
25 So he would be the one to get out of bed and go get

1 the kid or same thing, Janae crying, go out of bed,
2 go get them.

3 Q. Okay. And once the kids were up and
4 Cameron was up, what would typically happen?

5 A. Breakfast. They wake up hungry so
6 either light and cereal or they used to be know nor
7 full on Saturday breakfasts.

8 Q. What does that mean, "full on Saturday
9 breakfasts."

10 A. Bacon, eggs, pancakes, toast, juice, you
11 name, it was like a smorgasbord.

12 Q. And if you were making this big
13 breakfast, where was Cameron when you were doing
14 this breakfast?

15 A. Taking care of the kids.

16 Q. Was he upstairs, downstairs?

17 A. No. Normally when everybody's up and
18 the house is moving, we all filter downstairs
19 because there was a big screen downstairs, toy room
20 downstairs.

21 Q. Did April or Kay, when they would stay
22 over, ever help make breakfast?

23 A. April would.

24 Q. What about Kay?

25 A. No.

1 Q. Why not Kay?

2 A. She wanted the same deal Cameron had is
3 to do less and, you know, have, have April try to
4 do more of the hands-on, like, work, like, cooking,
5 cleaning, things like that.

6 Q. So where would Kay be?

7 A. With Cameron.

8 Q. Where would the kids generally watch TV
9 in the morning, would that be downstairs?

10 A. Generally, yes.

11 Q. Do you ever remember a time when April's
12 kids and your kids would sit in your room and watch
13 TV?

14 A. No.

15 Q. Why not?

16 A. Most of the time if there was kids over,
17 other than ours, they flocked towards Dontae's room
18 because it was the cool race car bed and they still
19 had a TV that, I believe, was similar size to the
20 one we had in our room, if not the exact same size.

21 Q. So would it ever be a consistent thing
22 for kids to watch TV in your bed, in your room?

23 A. No.

24 Q. Now --

25 A. I don't mess up my bed.

1 Q. I'm sorry.

2 A. I make my bed every day and I don't like
3 when kids jump on it after my bed's all beautiful
4 and pretty.

5 Q. When do you make your bed?

6 A. When we get out of it.

7 Q. So the first thing you do or one of the
8 first things you do?

9 THE COURT: Yeah, before we kind of
10 leave the room. So, I'll wake up, you know, you
11 stretch, you take your time but then we make the
12 bed, so it looks nice.

13 BY MR. MANN:

14 Q. Would Cameron help with making the bed?

15 A. Sometimes, yes. He's gotten better over
16 the years.

17 Q. Now, we saw in the picture that you had
18 a fish tank in the house?

19 A. Yes.

20 Q. Was that a small fish tank or a big fish
21 tank?

22 A. It was large.

23 Q. And who was primarily responsible for
24 cleaning that fish tank?

25 A. We kind of shared it. He would help

1 with the mechanics of the fish tank, but I would
2 clean it.

3 Q. And what would cleaning the fish tank
4 entail?

5 A. Taking out the fish, removing the top
6 filter parts, cleaning the lens on the light. It
7 would mean that you had to take the plants out. We
8 had a suction hose that you use to clean the rocks
9 so there wasn't any algae in the rocks. So then we
10 would take that out, clean that, put it all back
11 in, put fresh water.

12 Q. Would Cameron ever do this alone?

13 A. No.

14 Q. Would Cameron ever do this with someone
15 other than you?

16 A. No, because I'm meticulous.

17 Q. I'm sorry.

18 A. I'm too meticulous.

19 Q. Can you please just make sure to --

20 A. I apologize.

21 Q. Thank you. Was there ever a time that
22 Ambree came over by herself to stay the night with
23 the purpose of cleaning the fish tank?

24 A. No.

25 Q. Was there ever a time that Ambree came

1 over by herself to stay the night?

2 A. Not that I remember.

3 Q. Would it be normal for one of those four
4 girls to stay the night without the other three?

5 A. No.

6 Q. Was there ever a time that Cameron was
7 supposed to stay home with Ambree and clean out the
8 fish tank while no one else was home?

9 A. No.

10 Q. Do you ever remember a time that Ambree
11 actually cleaned out the fish tank?

12 A. No.

13 Q. And I asked you, but did Cameron ever
14 clean the fish tank on his own when you came home
15 and surprise, the fish tank is clean?

16 A. No.

17 Q. During your relationship with April, Kay
18 and the girls, did they always live at the same
19 house or the same location or was there multiple
20 locations?

21 A. Multiple.

22 Q. And were you going -- let me rephrase.
23 I'm sorry. Did you go to these multiple locations?

24 A. Yes.

25 Q. Was there ever a time that they lived at

1 a house in Summerlin?

2 A. Yes.

3 Q. Was that a one story or two story?

4 A. Two story.

5 Q. How many times do you think that you had
6 gone to the house in Summerlin?

7 A. Several, well, actually, a lot. We
8 would -- if we weren't at my house, we were at
9 their house and Dontae even had one of his birthday
10 parties at their house.

11 Q. And do you know about what years they
12 lived at the Summerlin house?

13 A. I'd be guessing. Around 2008, I would
14 guess. So I'm not certain.

15 Q. Do you remember a time going to Ambree's
16 Summerlin house all addressed up?

17 A. No. We dress up for, like, Christmas
18 parties and I do work attire.

19 Q. Do you remember the time you were
20 dressed up and maybe a kid named Jordan was there?

21 A. Jordan was her nephew and he was there
22 often.

23 Q. Okay. So you don't remember a
24 particular time?

25 A. No. It would have been more than once.

1 Dressed up, I don't remember but he was over there
2 often.

3 Q. Was there ever a time that you went to
4 the Summerlin house and had a discussion with
5 Cameron about his breath smelling like pee?

6 A. No.

7 Q. Do you ever remember asking him
8 repeatedly throughout the day why his breath
9 smelled like pee?

10 A. No.

11 Q. I'm sorry?

12 A. No.

13 Q. Was there ever a disagreement between
14 you and Cameron about his breath smelling like pee?

15 A. No.

16 Q. Now, how are you so certain that you did
17 not have this discussion with Cameron about his
18 breath smelling like pee?

19 A. Because if his breath stunk I would say
20 it stunk. I wouldn't say it smelled like pee. I
21 would -- I mean, most of the time when I do say
22 that, it's you smell like cilantro or you smell,
23 like, you know, fried eggs or you smell like
24 whatever he's eating, not necessarily pee.

25 Q. And have you ever known his breath to

1 smell like pee?

2 A. No.

3 Q. Was there a time that April and Kay
4 moved into your house?

5 A. Yes.

6 Q. Where was that? Let me rephrase. I'm
7 sorry. What house was that?

8 A. Cantina Creek.

9 Q. Do you know about what time period that
10 was?

11 A. October, 2009 to about beginning of
12 December, 2009.

13 Q. Okay. Why did they move in?

14 A. They were being put out of their house,
15 could not afford it.

16 Q. How did it come that you guys were able
17 to put them in your house?

18 A. They came to us and asked that they were
19 in a tight spot, that they couldn't afford the
20 place they were staying at and they were getting
21 kicked out of the house.

22 They didn't want to affect the children
23 as much and we, at that time, I didn't have Caylee,
24 so I had two kids, I had a guest room and an open
25 room and they asked if temporarily that they could

1 do that to be able to get on their feet to stay
2 with us.

3 Q. And was it crowded when they moved in?

4 A. It wasn't spacious. So yes, it was a
5 little crowded.

6 Q. Now, during this time that they lived
7 there, did you still do the chores around the
8 house?

9 A. Yes.

10 Q. Did the girls Ambree, Zailey, Zoë and
11 Karter ever participate in the house
12 responsibilities?

13 A. They would help the same as my kids,
14 clean up their own mess, you know, if they played
15 with toys or if they were doing something, they
16 were responsible for putting it away. I remember
17 Zailey having to take out the small trash, like, in
18 bathrooms and things like that.

19 Q. Did you do laundry during that time?

20 A. Yes.

21 Q. And who did laundry in the Palmer
22 household during that time, if you know?

23 A. From what I remember, April.

24 Q. Would you and April do laundry together?

25 A. No. We only have one washing machine

1 and one dryer.

2 Q. How do you know that it would be April
3 that would do the laundry?

4 A. Because I saw it.

5 Q. To your knowledge back then, did Cameron
6 ever do the laundry?

7 A. No.

8 Q. So in October -- from 2008 to December
9 of 2009 -- I'm sorry October, 2009 to December of
10 2009, to your knowledge, did Cameron do the laundry
11 at your house?

12 A. No.

13 Q. Now, was there a time when April and Kay
14 got in an argument with your family?

15 A. Yes.

16 Q. When was that?

17 A. December, 2009.

18 Q. And can you tell me what happened?

19 A. Yeah.

20 Q. Without telling me what specific people
21 said, can you describe what happened and who was
22 mad at who?

23 A. It was a few things happening during
24 that month. They wanted to stay longer and
25 extend the stay --

1 MS. KOLLINS: Well, I'm going to object,
2 hearsay. I mean, they wanted to stay, they had to
3 communicate that. So this is all based on hearsay.

4 THE COURT: I'm going to let -- I'm
5 going to overrule that because she's already
6 testified they moved in because they needed to
7 stay. So I'm overruling that. You can answer.

8 BY MR. MANN:

9 Q. Go ahead.

10 A. They wanted to stay longer than their
11 original-agreed upon time frame because they
12 weren't ready to be out on their own yet, and I
13 wasn't ready to have guests for longer. So I kind
14 of put my foot down and it wasn't friendly, it was
15 more they got offended.

16 But I didn't mean any offense. It was
17 just we agreed, like, let's just be friends. I
18 gave you this, I opened my door to you and your
19 family. So then it was -- it was hard because they
20 didn't understand where I was coming from and at
21 the same time period, they actually owed us money
22 from money we lent and they failed to pay that as
23 well. So that was falling behind and those things
24 combined made a huge explosion.

25 Q. And did that explosion cause any sort of

1 halt in your family seeing the Reed family?

2 A. Yes, it did.

3 Q. And, um, during December of 2009 and
4 January of 2010, did you see April and the girls?

5 A. Um, very seldom.

6 Q. Um, what would have been the occasion
7 that you would have saw them during that time?

8 A. I would go over to where they were
9 staying at that time after things calmed down but
10 it was pretty, it's pretty brutal.

11 Q. To your knowledge, did Cameron ever go
12 over there?

13 A. Never.

14 Q. And why do you say never?

15 A. Um, it wasn't, it wasn't welcomed.

16 Q. Now, do you remember a time when Cameron
17 was arrested?

18 A. Absolutely.

19 Q. Was there a lot of news coverage?

20 A. Absolutely.

21 Q. And what was that like for you?

22 A. Frightening.

23 Q. Where was the news?

24 A. Everywhere. Every news station, every
25 channel. I mean.

1 Q. Did the news ever want to speak to you?

2 A. Yeah. They came to my house and banged
3 on my front door for over a half an hour.

4 Q. And did you ever speak to the news?

5 A. No, I didn't.

6 Q. Did it seem, like, to you, that everyone
7 knew what was going on?

8 A. Absolutely.

9 Q. Was, to your knowledge, everyone talking
10 about it?

11 A. Yes.

12 Q. Now --

13 THE COURT: I'm not sure when you say
14 "everyone." I assume that's -- that's pretty
15 vague. I'm not sure who everyone -- there's a big
16 universe.

17 MR. MANN: I asked did it seem like to
18 her.

19 THE COURT: Everyone. But I don't know
20 to her everyone so please rephrase the question. I
21 don't know what everyone is. I don't know if you
22 mean all of Las Vegas and do you have another
23 objection.

24 MS. KOLLINS: The remainder of my
25 objection is relevance. What relevance is that to

1 this proceeding?

2 THE COURT: Well, I --

3 MS. KOLLINS: I mean, she wasn't
4 influenced by the media to disclose anything
5 like --

6 THE COURT: Well, I think he -- I'm
7 going to let it go a little bit. I feel it is
8 relevant based on some of the other things that
9 were testified to but could you please rephrase
10 that question because I'm not sure what you meant.

11 Maybe she knew and I missed it. So if
12 you could rephrase it.

13 BY MR. MANN:

14 Q. Sure. Ms. Thomas, did it seem like a
15 lot of people that you knew were talking about it?

16 A. Yes. I got phone calls from co-workers
17 I haven't worked with in years. I've got hundreds
18 of text messages, phone calls, you name it.

19 Q. Now, you stated that you guys would have
20 a lot of family events at your house and you would
21 go to a lot of other people's houses?

22 A. Um-hmm.

23 Q. Is that a yes?

24 A. Yes, I apologize.

25 MR. MANN: Do you need some water?

1 THE WITNESS: No, I'm good. Thank you.

2 BY MR. MANN:

3 Q. And during that time, did you ever
4 notice Cameron disappearing for long periods of
5 time?

6 A. Not long periods. He would go on smoke
7 breaks. He would smoke Black and Milds and only if
8 there was an occasion. So, like, 4th of July at
9 our house would be a thing I would remember. We'd
10 all be outside already and it's a holiday but --

11 Q. Did he smoke a lot?

12 A. No.

13 Q. Did he smoke in the car?

14 A. No.

15 Q. Was there ever a time that you thought
16 to yourself, other than obviously the smoking, that
17 it was strange that Cameron was gone for a while?

18 A. Nope.

19 Q. Do you remember a time that there was a
20 discussion with April or Kashonda about the girls'
21 bathing suits?

22 A. Yes.

23 Q. What do you remember?

24 MS. KOLLINS: Objection. Calls for
25 hearsay response.

1 THE COURT: If you're asking for what
2 you remember of the discussion, I have to -- that's
3 sustained. That's direct hearsay.

4 BY MR. MANN:

5 Q. Was there a time that you remember that
6 you had a -- court's indulgence.

7 Was there a time that you remember that
8 Cameron went to pick out bathing suits for some of
9 the girls?

10 A. Yes.

11 Q. Do you remember who -- who were those
12 girls?

13 A. Yes.

14 Q. Which girls were they?

15 A. Ambree and Karter.

16 Q. And were you there, without telling me
17 what was said, but were you there during that
18 discussion about the bathing suits?

19 A. Yes.

20 Q. And without telling me what was said,
21 who was that discussion with?

22 A. Myself, Cameron, April, and Kashonda.

23 Q. And to your knowledge, why didn't April
24 or Kay go and get the girls bathing suits?

25 MS. KOLLINS: Objection. For calls for

1 a hearsay explanation.

2 THE COURT: No. I -- I disagree. To
3 her knowledge, I mean.

4 MS. KOLLINS: Why did April or Kay --

5 THE COURT: No. Maybe she knows
6 something other than -- I'm going to overrule it.
7 You can answer that one.

8 THE WITNESS: Can you repeat the
9 question? I apologize.

10 BY MR. MANN:

11 Q. Sure. To your knowledge, do you know
12 why April or Kay did not go and get the kids
13 bathing suits?

14 A. From what I remember, it was a party
15 happening at their house and they needed to prepare
16 for the party.

17 Q. And why didn't you go and get the
18 bathing suits with the girls?

19 A. If I was helping, that would be -- from
20 what I remember, I was helping prepare the food
21 with April.

22 Q. To your knowledge, was going to get the
23 swimsuits something that Cameron wanted to do?

24 A. Yes. Because of the discussion.

25 Q. Okay. And was there a time after that

1 discussion that Cameron came back with the girls?

2 A. Yes.

3 Q. And did they have swimsuits?

4 A. Yes.

5 Q. Now, I have to apologize for the next
6 series of questions. They are going to be a little
7 bit personal.

8 A. Okay.

9 Q. How long have you known Cameron?

10 A. Since 1999. So it will be 17 years.

11 Q. And how long have you been married?

12 A. Since 2004 will be 12 years.

13 Q. And are you two sexually active?

14 A. Yes, we were.

15 Q. Have you seen your husband's penis?

16 A. Yes, I have.

17 Q. What color would you describe your
18 husband's penis?

19 A. Like a tan color.

20 Q. Would you ever use the word pink to
21 describe his penis?

22 A. No.

23 Q. Was there ever a time that you would
24 describe his penis as being rusty?

25 A. No.

1 Q. Or crusty?

2 A. No.

3 Q. I'm sorry?

4 A. No.

5 Q. Is there ever a time that you would
6 describe your husband's penis as having dead skin
7 all over it?

8 A. No.

9 Q. Now, what type of person is Cameron?

10 A. Very caring. Very loving. Genuine.
11 Thoughtful. Strong. A strong man. Very family
12 orientated. Dependable.

13 Q. And have you ever known him to hurt a
14 child?

15 A. No.

16 Q. Have you ever known him to -- let me
17 strike that.

18 MR. MANN: May I approach your clerk,
19 Your Honor?

20 THE COURT: Certainly.

21 MR. MANN: May I approach, Your Honor.

22 THE COURT: Yes.

23 BY MR. MANN:

24 Q. Showing you Defense Proposed Exhibit R.
25 Do you recognize that picture?

1 A. Yes.

2 Q. How do you recognize that picture?

3 A. It's me and my -- holding my daughter.

4 Q. Which daughter?

5 A. Janae.

6 Q. Do you know about what time this picture
7 was taken?

8 A. From the candle, yes. So 2009.

9 Q. What year was your daughter born?

10 A. 2007.

11 Q. Okay. And does that picture fairly and
12 accurately depict what it looked like in 2009?

13 A. Um-hmm.

14 Q. Is that a yes?

15 A. Yes.

16 Q. Sorry.

17 MR. MANN: I'd like to move for its
18 admission, Your Honor.

19 MS. KOLLINS: The State would object on
20 a relevancy basis.

21 THE COURT: What is the relevance? We
22 already did the house. We already know the layout.

23 So what's the relevance of this?

24 MR. MANN: The relevance is showing a
25 get-together. She talked about the birthday

1 parties that would happen and the people that were
2 there. This is 2009. In the picture there's
3 someone of relevance that we can talk about.

4 THE COURT: Why don't you approach
5 because you didn't lay that foundation.

6 Can you please approach.

7 (Whereupon there was a conference at the bench that
8 was not requested to be reported.)

9 THE COURT: And that's "R." I'm sorry.
10 Did I write it down right?

11 MR. MANN: "R." Correct.

12 THE COURT: I note the objection by the
13 State but I'm going to go ahead and admit it.

14 (Whereupon, Exhibit R was admitted.)

15 BY MR. MANN:

16 Q. Okay. And do you know the people in
17 this picture?

18 A. I do.

19 Q. And do you recognize any of the girls
20 that we are discussing in this picture?

21 A. One of them yes.

22 Q. Who is that?

23 A. Ambree.

24 MR. MANN: And if I may publish, Your
25 Honor?

1 THE COURT: Yes.

2 BY MR. MANN:

3 Q. Can you point to Ambree?

4 A. Right here in the red Adidas shirt.

5 MR. MANN: Court's indulgence, Your
6 Honor.

7 THE COURT: That's fine.

8 MR. MANN: Your Honor, at this time I'll
9 pass the witness.

10 THE COURT: Okay. We're going to do a
11 quick recess before we do the cross-exam on this
12 witness.

13 During this recess, you are admonished:
14 Not to talk to converse among yourselves or with
15 anyone else on any subject connected with this
16 trial; or read, watch or listen to any report of or
17 commentary on the trial or any person connected
18 with this trial by any medium of information
19 including, without limitation, newspapers,
20 television, the internet and radio; or form or
21 express any opinion on any subject connected with
22 the trial until the case is finally submitted to
23 you.

24 We'll take a brief recess and then we'll
25 finish with this witness.

1 THE MARSHAL: All rise for the jury.

2 (The jury exited the courtroom.)

3 THE COURT: We'll take a brief recess.

4 Do you want to put on what we did on
5 that photo so you don't lose your -- on the
6 exhibit?

7 MS. KOLLINS: Defense "R."

8 THE COURT: I just want to make sure you
9 have a record.

10 MS. KOLLINS: Can I have Ms. Thomas --

11 THE COURT: I was going to ask her at
12 the break. I wanted to do it before we took the
13 break while we remember it. Okay.

14 MS. KOLLINS: Your Honor, the State's
15 objection was relevance and the additional, you
16 know, trying to avoid speaking objections but my
17 additional objection at the bench was cumulative.
18 We discussed how many more, he's a great guy
19 witnesses are we going to have. We've already had
20 five or six, and now we're hearing from the wife.

21 So that was, you know -- that was also
22 part of the objection. The Court overruled that
23 because I guess Ambree was in the photo.

24 THE COURT: No. I overruled it because
25 I felt it was relevant. I understood what he was

1 saying. I don't think it -- at this point, we had
2 not had any or family photos.

3 We had photos of the property and I
4 think one or two maybe had his children in it, but
5 these are the family gatherings that they had
6 talked about.

7 Once again, I said even though Ambree's
8 in it, she is not denying it. I didn't feel it was
9 that cumulative at that time. And as long as we
10 don't do anymore, which we are not going to, that's
11 why I admitted the exhibit.

12 MR. MANN: Thank you, Your Honor.

13 THE COURT: Okay. Do we have anything
14 else on the record?

15 MR. MANN: No.

16 (Whereupon, a brief recess was taken.)

17 THE COURT: Did we decide on a time
18 tomorrow? There's six cited from you. Are those
19 all -- well, undisputed ones.

20 MS. RINETTI: We're going to change --
21 there's of his, there's two that I need to -- I
22 want to combine.

23 THE COURT: Hold on one second, Bill.
24 Uh-huh. I'm sorry.

25 MS. RINETTI: There's two alibi ones, I

1 need to combine them. I think they're duplicative
2 and we're only objecting to the two reasonable
3 interpretations instructions.

4 THE COURT: Okay. One was a -- okay.
5 All right. I just wondered because I want to know,
6 get some idea from you when we can bring them back.

7 You said you have a witness at 10:00.

8 MR. MANN: No. The witness can be here
9 at 9:00.

10 THE COURT: Okay. I'm just wanting to
11 know when we can do jury instructions on the
12 record. Do you want to do them in the morning?
13 I'm here.

14 MS. RINETTI: I don't care.

15 THE COURT: Well, if we do jury
16 instructions at 9:00, do you think -- well, you
17 know, you're going to put him on. So we could
18 start at 9:30, however long it takes.

19 I'm just trying to figure out when to
20 tell this jury to come back.

21 MR. MANN: I mean, do you want to --
22 depending on when we get done tonight.

23 THE COURT: I don't know. I haven't
24 looked at them. If you want, at least tell me what
25 you're objecting to, because what I just saw in

1 there was six cited from you, and that's not
2 exactly -- so I don't know. And then one big set
3 from the State.

4 So we could at least start on them, if
5 you would like to, so I could at least see where
6 you're at and at least have a better handle. That
7 would be great.

8 MR. MANN: I think as to legal
9 discussion, there's really going to be one or two
10 issues.

11 THE COURT: I don't know. I'm just
12 trying. Okay.

13 MR. MANN: I'm just giving you a heads
14 up.

15 THE COURT: So then here's my answer --
16 here's my question.

17 When should I tell this jury to come
18 back tomorrow. And I want to get in as much as I
19 can.

20 MS. RINETTI: I mean, we can -- do you
21 know which ones you're objecting to right now for
22 ours? Because we could do that, and settle them,
23 just settle them for five or ten minutes tomorrow
24 morning as far as order and things like that.

25 MR. MANN: Well, the order I need to

1 look at again but, I would suggest, Your Honor, to
2 answer your question, I would suggest 9:00 o'clock.

3 THE COURT: Okay. That's fine and if we
4 have to come earlier, I'll wake you up. But I come
5 early. I can be here at 8:00. I can do whatever
6 makes it tomorrow manageable.

7 MS. RINETTI: 9:00 is fine.

8 THE COURT: I know it's a pain. So 9:00
9 o'clock, I'm going to tell the jury all right and
10 then we'll work from there. I'll stay tonight,
11 whatever you want.

12 MS. RINETTI: Well, 9 a.m. for jury
13 instructions. You want the jury here at 9:30?

14 THE COURT: I'll do what -- 9:30. I'll
15 compromise. 9:30 is perfect.

16 MS. RINETTI: Yeah. And we'll be here
17 at 9:00 to do jury instructions.

18 THE COURT: This will be perfectly
19 acceptable.

20 MS. RINETTI: Okay.

21 THE COURT: I just know we're going to
22 have to tell them and I don't want to bring you
23 guys up to the bench and they just love to watch
24 what we do. Okay.

25 I think they get more entertained at the

1 -bench and -- okay. Sorry, Bill. Thank you, you
2 guys.

3 (The jury entered the courtroom.)

4 THE MARSHAL: Please be seated.

5 THE COURT: Counsel stipulate to the
6 presence of the jury, please.

7 MR. MANN: Yes, Your Honor.

8 MS. KOLLINS: Yes, Your Honor.

9 THE COURT: Okay. Let's start
10 cross-examination, Ms. Kollins.

11 MS. KOLLINS: Thank you.

12 THE COURT: You're welcome.

13

14 CROSS-EXAMINATION

15 BY MS. KOLLINS:

16 Q. Good afternoon, Mrs. Thomas. My name is
17 Stacey Kollins. I'm with the district attorneys
18 office.

19 How are you, this afternoon?

20 A. Good. How are you, Stacey?

21 Q. I'm well. Thank you. I'm going to ask
22 you a few questions, if that's okay.

23 A. Sure.

24 Q. You have two kids Dontae -- three now.
25 Dontae and Janae?

1 A. Caylee.

2 Q. Caylee or --

3 A. Caylee with a C.

4 Q. And what are their dates of birth in
5 order?

6 A. Dontae, August 18th, 2004; Janae,
7 June 18th, 2007; and Caylee, April 29th, 2010.

8 Q. Thank you. And you and Mr. Thomas have
9 been married since 2004?

10 A. Yes.

11 Q. Mr. Mann showed you some pictures of
12 different homes that you've had. I have some
13 questions for those about it for you.

14 Showing you what's been admitted as
15 Defense A9. That's one of the pictures you looked
16 at earlier?

17 A. Yes.

18 Q. And that is from the North Las Vegas
19 house?

20 A. Yes.

21 Q. And that is a kind of a pony wall there
22 at the top of the stairs?

23 A. Yes.

24 Q. Like a half wall. Okay.

25 And you said that kids weren't really

1 allowed to watch television in your room; is that
2 right?

3 A. It wasn't that they weren't allowed. It
4 just wasn't something that they wanted to do often.

5 Q. Okay. And Defense A15, those are your
6 kids?

7 A. Yes.

8 Q. That's your master bedroom?

9 A. Yes.

10 Q. Watching TV?

11 A. Yes.

12 Q. And who took that photo?

13 A. I don't remember.

14 Q. Okay. Now, these photos of all the
15 rooms empty, did you take those in preparation for
16 this case?

17 A. No.

18 Q. What did you take those for?

19 A. When we built our house, we were photo
20 crazy, we have a whole album of us building our
21 house, and it was nice to see it all put together
22 and then we loved how we were able to look back, so
23 when we moved into our second, it was same thing.

24 Q. So this picture of your first house,
25 that was taken just to document what the house

1 looked like back when you lived in it?

2 A. Correct.

3 Q. Okay. Now, showing you Defense B3,
4 that's what you identified as Cameron's office,
5 right?

6 A. Yes.

7 Q. And that also has a half wall around it,
8 like, a pony wall?

9 A. Correct.

10 Q. Okay. And showing you Defense B7,
11 that's your living room in your current home down
12 by Blue Diamond?

13 A. Cantina Creek.

14 Q. Cantina Creek?

15 A. Correct.

16 Q. In the Blue Diamond area?

17 A. Yes, ma'am.

18 Q. And these sofas here, do they have
19 recliners on them?

20 A. On the ends, yes.

21 Q. On the ends -- on the ends of each one
22 of those sofas?

23 A. Yes.

24 Q. And another view, Defense B23, you said
25 that was a gerbil cage. Are we referring to that

1 sitting by that, kind of, cut-out wall?

2 A. Guinea pig.

3 Q. Guinea pig?

4 A. Guinea pig. Yeah.

5 Q. I know it was a "G" animal?

6 A. You were close.

7 Q. I know. It's a long day. Also a pony
8 wall, kind of going into that entrance, a half
9 wall?

10 A. Um-hmm.

11 Q. Is that a yes?

12 A. Yes.

13 Q. And then showing you Defense B36, that's
14 your master bedroom --

15 A. Yes.

16 Q. -- at your current home?

17 A. It's picture of the master bedroom on
18 Cantina Creek.

19 Q. And that also has a half wall or pony
20 wall in it?

21 A. Yes.

22 Q. Now, you said you work at Bank of
23 America. What is your position there again?

24 A. A CSSO, client, sales and service
25 officer.

1 Q. And how long have you been employed in
2 that position?

3 A. Since November.

4 Q. Since November of?

5 A. Of 2015.

6 Q. Okay. And prior to that, how were you
7 employed?

8 A. Bank of America as well.

9 Q. In what position?

10 A. Um, financial center assistant manager.

11 Q. How long have you been employed in that
12 regard?

13 A. Nine years.

14 Q. So since 2000 or since 2005 about; is
15 that about right?

16 A. About right. Approximately.

17 Q. You mentioned you work Saturdays
18 sometimes?

19 A. I did, yes.

20 Q. You did or you currently do?

21 A. I currently do not work Saturdays.

22 Q. And did you work Saturdays in your
23 position prior to this one?

24 A. Yes.

25 Q. And you said between one and three

1 Saturday a month?

2 A. Fluctuating. It wasn't consistent.

3 Q. Who would watch the kids when you were
4 working on those Saturday?

5 A. Cameron would.

6 Q. So Cameron would be alone with the kids?

7 A. Depending on what was going on.

8 Q. He would be one of the primary adults
9 though?

10 A. Absolutely.

11 Q. And you said he wasn't a hands-on guy?

12 A. I didn't --

13 Q. In terms of doing stuff around the
14 house?

15 A. Yeah. Cooking or cleaning. I mean, he
16 can make cereal but no stove or anything else.

17 Q. So you don't really know everything that
18 was going on there Saturday mornings when you were
19 at work?

20 A. Well, kids would tell me what's going
21 on. I would call if I wasn't busy.

22 Q. Okay. But you weren't there, is my
23 point?

24 A. Correct.

25 Q. Okay.

1 MS. KOLLINS: May I approach the
2 witness, Your Honor?

3 THE COURT: Yes.

4 BY MS. KOLLINS:

5 Q. Showing you what has been marked for
6 purposes of identification as State's Proposed
7 Exhibit 8?

8 MR. MANN: Your Honor, may I see that
9 exhibit first, please.

10 MS. KOLLINS: It was provided by Mr.
11 Mann in discovery. I'll show it to him though.

12 THE COURT: Okay. Sure.

13 MR. MANN: Okay.

14 BY MS. KOLLINS:

15 Q. State's Proposed Exhibit 8. Do you
16 recognize that photograph?

17 A. Yes.

18 Q. And what is depicted in that photograph
19 and how do you recognize it?

20 A. It is our master bedroom and it is our
21 TV that was mounted in the master bedroom in
22 between, like, the loft area where there was a desk
23 and a couch and then to the left is our bed.

24 Q. Okay. Are we talking about the house
25 you reside in now or your previous --

1 A. Cantina Creek.

2 Q. Cantina Creek. Fair and accurately
3 depict that television and how it was mounted?

4 A. From what I can see, yes.

5 MS. KOLLINS: State would move for the
6 admission of 8?

7 THE COURT: Okay. Any objection?

8 MR. MANN: No objection.

9 THE COURT: State's 8 will be admitted.
10 (Whereupon, State's Exhibit 8 was admitted.)

11 BY MS. KOLLINS:

12 Q. And was this another photograph that you
13 took to document the looks of your home or is this
14 a photograph you took in preparation for this case?

15 A. I don't remember who took that photo.

16 Q. Looks like there's racing on TV?

17 A. Yes. Cameron likes cars and so does my
18 son.

19 Q. Cameron likes cars and car racing?

20 A. Um-hmm.

21 Q. Is a yes?

22 A. Yes.

23 Q. And he frequently watches those things
24 on TV?

25 A. He will.

1 Q. He does or --

2 A. He does, depends on time.

3 Q. When Cameron and you made the decision
4 to take on April and Kay's kids as God children,
5 that was a big decision?

6 A. Yes, it was.

7 Q. A lot of responsibility?

8 A. Yes.

9 Q. You considered them family at the time?

10 A. Yes, we did.

11 Q. Close with those girls?

12 A. Yes, we were.

13 Q. They were good kids?

14 A. Yes.

15 Q. Okay. You decided that was an important
16 role to take on?

17 A. Yes.

18 Q. Okay. You didn't want to split them up?

19 A. Right.

20 Q. He stepped in as a dad even, a father
21 figure in a family that didn't have a male figure?

22 A. Yes.

23 Q. Okay. Um, so when you were working
24 Saturdays, Cameron was working at two different day
25 cares, right? Back when you had your previous

1 position at Bank of America?

2 A. Depends on the year, correct.

3 Q. Well, other than the Kids 'R' Kids or
4 Bright Child, thank you, Ma'am, where would Cameron
5 have worked in those years?

6 A. Those are the two.

7 Q. Okay. So even when you would work all
8 those Saturdays, Cameron still did no house
9 cleaning, no dishes, no laundry, nothing like that?

10 A. Um, no. I worked a shorter shift on a
11 Saturday. It wasn't an eight-hour shift.

12 Q. I wasn't really asking you how many
13 hours you worked on Saturday. What I was asking
14 you was did all the responsibility of those types
15 of things in the home always fall on your lap?

16 A. What types of things.

17 Q. Laundry, dishes?

18 A. Yes.

19 Q. Cleaning, bathroom cleaning, making
20 beds? That always was on you?

21 A. Correct.

22 Q. He never did anything like that?

23 A. He would assist with making our bed. He
24 would assist in helping my son make his bed.

25 Q. Okay. And help pick up toys?

1 A. Correct.

2 Q. But that's where it stopped?

3 A. Pretty much.

4 Q. Did you do all the cooking?

5 A. I did.

6 Q. Even though you have little kids?

7 A. Yeah. Yes.

8 Q. Now, some individuals were in here
9 earlier. Let me get the names, I apologize. I
10 have to type because I can't write as fast as
11 people talk.

12 Jolyn Welch?

13 A. Okay.

14 Q. Did she spend a lot of time in your
15 home?

16 A. She would.

17 Q. More time or less time than Kay and
18 April?

19 A. Less time.

20 Q. How much less time?

21 A. Depends on the time period.

22 Q. Okay. Well, let's start in 2005. Did
23 you know her in 2005?

24 A. No.

25 Q. Did you know her in 2006?

1 A. No.

2 Q. And you knew Kay and April then?

3 A. Correct.

4 Q. And then you knew Kay and April still in
5 obviously 2006, if you knew them in 2005?

6 A. Correct.

7 Q. Now, in 2007, did she and her family
8 Jolyn and her family spend time at your home?

9 A. Yes.

10 Q. Okay. For what kind of events?

11 A. Jolyn and her family would come over for
12 barbecues, for birthdays, anything family related.
13 Um, when I had my daughter in 2010, she came over
14 and helped and the kids were very involved.

15 Q. Would her and her family spend the
16 night?

17 A. Not her. Her children would spend the
18 night.

19 Q. Her and her husband would not, however?

20 A. No.

21 Q. Would her children ever spend the night
22 when Kay and April and we'll just say the four
23 girls or three girls probably then spent the night?

24 A. It's possible.

25 Q. Possible. Okay. Any specific times you

1 remember?

2 A. With both families, nothing specific.

3 Q. Okay. So all of the pictures that Mr.
4 Mann showed you, looks like there was about 41, 42,
5 43 of them, the ones from the North Las Vegas house
6 were not prepared for today, but the ones of the
7 Cantina Creek house were?

8 A. No neither were prepared for today.

9 Q. Okay. You said, "Cameron would never
10 hurt a kid." What does that mean to you? What
11 does "hurt a kid" mean?

12 A. To me, "hurt a kid" would mean
13 intentional harm or wrongdoing to a child.

14 Q. Okay. What is -- what does that
15 encompass?

16 A. To me, you can hurt somebody
17 emotionally. You can hurt something physically.
18 There's a wide range of hurting somebody,
19 especially children. They cry very easily. They
20 get upset and emotional very easily.

21 Q. Does that encompass hurting them
22 physically?

23 A. Yes.

24 Q. Who takes care of the punishment in your
25 home?

1 A. We both do.

2 Q. And what is the typical punishment in
3 your home?

4 A. Depends on the child and it depends on
5 what the issue was at hand.

6 Q. Okay. Well, why don't you give me an
7 example of an issue at hand and the type of
8 punishment that you feel is appropriate.

9 A. Um, okay. My six-year-old, Caylee, was
10 drawing on our kitchen table.

11 Q. Yes.

12 A. But she's six and we were happy she
13 drew on the paper as well. So we made her clean
14 it up and we also made her sit in time out so she
15 could think about what she had to do, like, what
16 the issue was, what it hurt.

17 So she needed to be able to have a few
18 minutes time out, be able to talk through why that
19 was an issue and what we're going to do going
20 forward.

21 Q. Does punishment in your home ever
22 include corporal punishment?

23 A. Define corporal punishment.

24 Q. Spanking, hitting with a belt, any kind
25 of physical hands on things, on a child.

1 Does that ever include that?

2 A. We have hands on, yes.

3 Q. Do you have hands on with Dontae?

4 A. We have.

5 Q. Does your husband have hands-on
6 punishment with Dontae?

7 A. We have.

8 Q. Has it been excessive?

9 A. No.

10 Q. Never?

11 A. No.

12 Q. But he would never hurt a kid, right?

13 A. Well, you're twisting that to be able to
14 say that it was intended to cause harm and to hurt.
15 That wasn't an intention.

16 Q. Okay. The intent of corporal punishment
17 is to punish, right? And deter conduct, right?

18 A. Okay.

19 Q. So you said he would never hurt anyone.
20 So I'm asking you, has he used excessive corporal
21 punishment on Dontae?

22 A. And I said no.

23 Q. So I mean, hurt is hurt, right?

24 A. Okay.

25 Q. Okay. Did you think it was a good idea

1 to let Cameron take girls to go swimsuit shopping?

2 A. It was fine.

3 Q. Even with all the female adults in the
4 house, nobody else could take them?

5 A. From what I remember, it was an event
6 getting together and these children were not
7 allowed to participate in the event without
8 swimsuits.

9 Q. Okay. Well, but my question is: There
10 were three other female adults in the house; you,
11 Kay and April, but you sent the male adult to go
12 swimsuit shopping?

13 A. The parents did, yes.

14 Q. Now, there was some discussion about a
15 title loan that was taken out. Remember when April
16 and Kay were living with you?

17 A. Okay.

18 Q. You talked about it with Mr. Mann on
19 direct. You don't --

20 A. I just said there was a loan that they
21 needed to repay.

22 Q. Okay. A loan. A loan or a title loan,
23 whichever you want to call it. If it was just a
24 loan, that's fine.

25 A. Okay.

1 Q. And did both April and Kay approach you
2 and your husband to take out that loan?

3 A. No.

4 Q. They approached just Cameron?

5 A. Correct.

6 Q. And did you know about that loan when it
7 was taken out?

8 A. Not originally, no.

9 Q. Not so happy about that?

10 A. There was a discussion, yes.

11 Q. Because it's our money, right?

12 A. It is.

13 Q. Right. Never the less, they were
14 struggling. You took them in your home?

15 A. Correct.

16 Q. You were still close with them at that
17 time?

18 A. Yes.

19 Q. The missed payments were unfortunate?

20 A. Correct.

21 Q. And you were eventually paid in full on
22 that, correct?

23 A. Eventually, yes.

24 Q. In early 2010, you were paid in full on
25 that?

1 A. Mid to early, yes.

2 Q. Okay. Prior to your trip to Arizona to
3 see them, you were paid in full; is that correct?

4 A. That is correct.

5 Q. And what made you decide to take you and
6 your family, your kids, at that time, to go visit
7 April and Kay in Arizona?

8 A. We were growing closer and, at that
9 time, I was on leave from having my youngest in
10 2010. So I had time off and we don't get too many
11 vacations so we took that as an opportunity.

12 Q. Did it feel good to reconnect with your
13 friends?

14 A. We were building back towards that.

15 Q. Okay. But was it positive?

16 A. Oh, yes. It was.

17 Q. Had it been negative, would you have
18 gone?

19 A. No.

20 Q. Okay. If the relationship between you
21 and April and Kay and the girls been what it had
22 been when they moved out of your house, would you
23 have gone?

24 A. No.

25 Q. Would you have exposed your kids to

1 anything toxic going on with the adults if you were
2 still in a bad way with April and Kay?

3 A. Absolutely not.

4 Q. Okay. So you and Cameron made that
5 decision together?

6 A. Correct.

7 Q. And the loan was paid off by then,
8 right?

9 A. Correct.

10 Q. And that was still just -- that was the
11 major point of contention after they moved out, was
12 the money?

13 A. Well, can you repeat the question?

14 Q. Well, when they moved out, I know you
15 spoke earlier about they overstay their welcome?

16 A. Yes.

17 Q. And it was not well received when you
18 said, no.

19 A. Correct.

20 Q. Right. And when they moved out, they
21 still owed you money?

22 A. Correct.

23 Q. And that was prior to Christmas?

24 A. Correct.

25 Q. And you ended up not spending the

1 holidays together?

2 A. Correct.

3 Q. But you would continue to visit them
4 where they were living at Kourtney's?

5 A. Correct.

6 Q. And why did you do that, if things were
7 so toxic?

8 A. Both myself and Kay kept in contact.

9 Q. Okay.

10 A. And they were trying to apologize and
11 make things right because they knew they were wrong
12 to do the series of events that they did.

13 Q. In fact, while they were living at
14 Kourtney's, Cameron even took a couple
15 opportunities to go ask to pick up the girls,
16 right, to spend some time with?

17 A. Not that I'm aware of, no.

18 Q. So when do you mend fences enough to
19 make a decision to go to Arizona?

20 A. We talked for several months and we went
21 through what happened. There was several threats
22 that were made. There were several heavy
23 conversations that had to be discussed through
24 before we even talked about even mending the
25 friendship.

1 Q. Okay. But eventually you mended it and
2 you went to Arizona?

3 A. Yes.

4 Q. And took your kids with you. So there
5 was nothing of threatening there, correct?

6 A. Correct.

7 Q. Okay. And you stayed for a few days and
8 that was an overnight visit. What, a couple
9 overnights?

10 A. Correct.

11 Q. It sounds like it was pretty crowded.
12 There was a lot of people there?

13 A. Yes.

14 Q. About 16 people there?

15 A. I haven't head counted but it sounds
16 correct.

17 Q. Because you and your kids and Courtney
18 and her significant other and her child or children
19 and them; is that right?

20 A. Yes.

21 Q. And then April and Kay and the four
22 girls?

23 A. Yes. Yes.

24 Q. And then your families also made plans
25 in August of 2010 to get together?

1 A. Yes.

2 Q. Okay. And now, April and Kay were not
3 together at that time, right?

4 A. Correct.

5 Q. And who stayed at your house?

6 A. Kashonda, Kay.

7 Q. Kay stayed at your house and April got a
8 hotel?

9 A. From what I remember.

10 Q. And how was your relationship then?

11 A. That was fine as well.

12 Q. Okay. Everything was fine with you and
13 Kay?

14 A. Yeah.

15 Q. Because you've known Kay for a long
16 time?

17 A. I have.

18 Q. I think Cameron's known her longer than
19 you have?

20 A. Yes, he has.

21 Q. But you've also been very close to her
22 and known her growing up in Las Vegas?

23 A. Correct.

24 Q. And so everything was fine for that
25 August visit?

1 A. Everything went fine.

2 Q. And between August and the time Cameron
3 was arrested, nothing popped up between you and
4 April and Kay? There was no fight?

5 A. Not in 2010.

6 Q. Okay. No money owed?

7 A. Not in 2010.

8 Q. Okay. The fish tank was that in both
9 houses or just one house?

10 A. Both.

11 Q. Okay. And you always took care of the
12 mechanical kind of stuff with that?

13 A. Actually the opposite. He would help
14 with the hoses and the water, and I would do the
15 cleaning of the fish tank.

16 Q. Okay. Um, and what room is that in?

17 A. In both houses, they were in the living
18 room or close by.

19 Q. Did you ever go to either Bright Child
20 or Kids 'R' Kids when Cameron was working on a
21 Parent's Night Out?

22 A. Not that I remember.

23 Q. Okay. So you would never go stay with
24 him there or sit with him there?

25 A. No. I would be at home with the kids,

1 from what I remember.

2 Q. And you never volunteered at Kids 'R'
3 Kids or Bright Child?

4 A. I would help, more project, not
5 necessarily hands on with children. It was if
6 there was painting involved or if they got a new
7 shipment of books, anything that needed lots of
8 work that couldn't be done while the kids were
9 there.

10 Q. Okay. So you would be there at a time
11 when the facility was closed to children?

12 A. Most of the time, yes.

13 Q. So if something in the physical plant
14 needing upgrading and everybody was getting
15 together, you would help with something like that?

16 A. Correct.

17 Q. Did you give a statement to the Las
18 Vegas Metropolitan Police Department regarding this
19 case?

20 A. No.

21 Q. Did you give a statement to the district
22 attorney's office?

23 A. No.

24 Q. Did you give a statement to Mr. Mann's
25 investigator or an interview?

1 A. Possibly.

2 Q. Possibly. As you sit there today, do
3 you recall whether you gave an interview or a
4 statement to Mr. Mann's investigator?

5 A. I know there was an investigator
6 involved. I don't remember if it was a formal
7 statement.

8 Q. Okay. When would that have taken place?

9 A. Anywhere from 2010 till 2013 or '14.

10 Q. Okay. So somewhere in the four-year
11 span you may have spoken to the investigator, but
12 you're not sure when and you don't know if it was
13 official.

14 A. I know officially that it wasn't
15 recorded or anything I had to sign or anything as
16 official as today.

17 MS. KOLLINS: All right. Pass the
18 witness, Your Honor.

19 THE COURT: Okay. Any redirect?
20

21 REDIRECT EXAMINATION

22 BY MR. MANN:

23 Q. Ms. Thomas, was there ever a time that
24 the Las Vegas Metropolitan Police Department asked
25 you to give a statement?

1 A. Yes.

2 Q. When was that?

3 A. Well, everybody came to me for a
4 statement when it first happened, whether it was
5 the news or the police, I mean. I remember
6 multiple agencies coming to request a statement.
7 So I -- I can't tell you if it was the company that
8 you just said.

9 Q. The Las Vegas Metropolitan Police
10 Department?

11 A. Correct.

12 Q. So it's your recollection that there may
13 have been someone official that came to take a
14 statement but you don't remember who that was?

15 A. Correct.

16 Q. Do you know if it was a detective?

17 A. I don't remember.

18 Q. And Ms. Kollins asked you about your
19 trip to Arizona in May.

20 Do you remember that trip?

21 A. I do.

22 Q. Do you remember anything unusual
23 happening during that trip?

24 A. Unusual, no.

25 Q. Do you remember if Ambree or Zailey were

1 acting any different around Cameron during that
2 trip?

3 A. No, they were very happy to see us.

4 Q. And the question regarding punishment,
5 was there ever a time that you felt that Cameron
6 overstepped his bounds on punishment?

7 A. No, we would discuss.

8 Q. Was Mr. Thomas always calm?

9 A. No. We both had our moments where we
10 would get upset. Every parent gets upset.

11 Q. Do anything to any of your children that
12 you thought was excessive?

13 A. No.

14 MR. MANN: Nothing further Your Honor.

15 THE COURT: Okay. Any re-cross?

16 MS. KOLLINS: Very briefly.

17

18 RE-CROSS-EXAMINATION

19 BY MS. KOLLINS:

20 Q. And I'm sorry. I'm not clear. So a
21 police officer did come to speak to you and you
22 declined; is that accurate?

23 A. Like I said earlier, I had -- everything
24 was happening so fast during that time period,
25 there was people knocking on my door left and right

1 to be able to -- to contact us. I even had one
2 person follow me leaving my house.

3 Q. And I'm not asking about the media,
4 ma'am. I'm just asking about Metro. The Las Vegas
5 Metropolitan Police Department.

6 A. Okay.

7 Q. Either a plain clothes detective or
8 patrol person. Did they reach out to you to give
9 them a statement regarding this case?

10 A. Not that I remember.

11 Q. Okay. Because before you said they did.

12 A. I said several people reached out. I
13 don't remember which agency.

14 Q. Law enforcement? Were they law
15 enforcement?

16 A. I don't remember.

17 MS. KOLLINS: Okay. Court's indulgence.
18 Your Honor, may we approach?

19 THE COURT: Yes.

20 (Whereupon there was a conference at the bench that
21 was not requested to be reported.)

22 THE COURT: Okay.

23 BY MS. KOLLINS:

24 Q. Was there ever an occasion where Cameron
25 excessively punished Dontae to cause others in the

1 home or day care concern?

2 A. Not that I remember.

3 Q. Not that you remember. There wasn't a
4 discussion had between you and Cameron regarding
5 excessive punishment of Dontae?

6 A. We would discuss punishment at length
7 but I don't remember being a long discussion.

8 Q. Do you remember a discussion however?

9 A. Well, every punishment comes with a
10 discussion.

11 Q. Well, what I'm talking about is
12 excessive punishment. By "excessive," I mean
13 punishment that leaves marks, okay?

14 A. Okay.

15 Q. Did you have a discussion with your
16 husband, prompted by the concern of others, that he
17 had excessively punished your son?

18 A. No. I do not remember having a
19 discussion prompted by others regarding hurting my
20 son.

21 MS. KOLLINS: Okay. Nothing else, Your
22 Honor.

23 THE COURT: Okay.

24 MR. MANN: No further questions.

25 THE COURT: Any juror questions? Oh,

1 goodness. Okay.

2 All right. I'm going to ask you some
3 question that have been requested by the jurors.
4 We get to do that under Nevada law. Answer them
5 for everybody and then there can be follow up
6 either from Mr. Mann or Ms. Kollins.

7 THE WITNESS: Okay.

8 THE COURT: To your knowledge, would
9 Cameron drop Mada at home while the Reeds lived
10 with Kourtney?

11 THE WITNESS: Yes.

12 THE COURT: Would Cameron be in bed when
13 you would leave to work on Saturday ever?

14 THE WITNESS: Not that I remember.

15 THE COURT: Not that you remember ever?

16 THE WITNESS: Because our kids were
17 little ones at that time -- it depends on the time
18 frame.

19 THE COURT: I'm sorry?

20 THE WITNESS: It depends on which time
21 period. When our kids were little and not
22 self-sufficient, he would always have to be up.

23 THE COURT: Okay. All right. They can
24 do the followup.

25 Can you recall seeing Cameron laying on

1 the floor with Brie during the Arizona visit?

2 THE WITNESS: By themselves? By
3 themselves, no. We laid on -- everybody was on the
4 floor in a group to watch a movie.

5 THE COURT: All right. During your
6 dating time with Mr. Thomas before marriage, did
7 Mr. Thomas interact with friends' kids or any kids?

8 THE WITNESS: Yes.

9 THE COURT: If so, was the kids always
10 wanting to hang around Mr. Thomas?

11 THE WITNESS: Hang around the whole
12 group. Not specifically him.

13 THE COURT: During the outings at your
14 house, was there other male figures there with
15 wives?

16 THE WITNESS: Yes.

17 THE COURT: If so, did you ever observe
18 the kids sitting on the -- on their -- on the male
19 figure's laps, other than their own kids?

20 THE WITNESS: If I understand the
21 question, if we had another couple man and woman
22 and would other children sit on this other man's
23 lap --

24 THE COURT: Correct.

25 THE WITNESS: -- is that the question?

1 THE COURT: Yes.

2 THE WITNESS: Yes.

3 THE COURT: The answer is yes?

4 THE WITNESS: The answer is yes.

5 THE COURT: Did Cameron ever watch Kay's
6 kids if born -- hold on.

7 Did Cameron ever watch Kay's kids if
8 born before working -- if born, before working at
9 both day care centers? Did he ever watch the kids
10 before he worked at the day care centers?

11 THE WITNESS: Like, before he went to
12 work or before he worked at the day care?

13 THE COURT: Before working, I would
14 assume but either way. Take it before working at
15 the day care center, did he ever watch the kids?

16 THE WITNESS: He worked at the day care
17 center the whole time.

18 THE COURT: Okay. If you did it that
19 way, did he ever -- did he ever watch Kay's kids
20 before he went to the day care center. Let's do it
21 that way.

22 THE WITNESS: So meaning he would be
23 home alone with the kids on the way to work? No,
24 not that I remember.

25 THE COURT: Okay. What kind of hours

1 did you work from 2005 to 2010?

2 THE WITNESS: Monday through Friday
3 anywhere from 8:00 o'clock till 5:00 or 6:00, 6:30
4 at the latest. On a Saturday, from 8:00 to 2:00.

5 THE COURT: What kinds of hours would
6 you usually work on Saturdays when you would work,
7 and you answered that question for us. Okay.

8 Did the other four God children receive
9 gifts from Christmas and special events from
10 Cameron and you?

11 THE WITNESS: Absolutely.

12 THE COURT: When you work Saturdays, if
13 Ambree and Zailey were at your house, was April and
14 Momma K there also?

15 THE WITNESS: Yes.

16 THE COURT: How long has Dontae owned
17 the car bed?

18 THE WITNESS: That's a good question. I
19 want to say since he was one.

20 THE COURT: Since he was one.

21 THE WITNESS: One. So probably 2005.

22 THE COURT: When visiting in Arizona, do
23 you remember who got up first? You or your
24 husband?

25 THE WITNESS: We would get up together.

1 THE COURT: Okay. All right. And Mr.
2 Mann, would you like to do any followup?

3 MR. MANN: Court's indulgence again.
4 I'll pass, Your Honor.

5 THE COURT: Okay.

6 MS. KOLLINS: Nothing by the State, Your
7 Honor. Thank you.

8 THE COURT: All right. Thank you very
9 much.

10 THE WITNESS: Thank you.

11 (The witness exited the courtroom.)

12 THE COURT: All right. So we're going
13 to start at 9:30 tomorrow. Tomorrow's Friday and
14 we're going to get our stuff tonight, right? Yes.

15 So I'm starting at 9:30 tomorrow. So
16 this is your recess. Perfect timing, 4:59.

17 You are admonished: Not to talk to
18 converse among yourselves or with anyone else on
19 any subject connected with this trial; or read,
20 watch or listen to any report of or commentary on
21 the trial or any person connected with this trial
22 by any medium of information including, without
23 limitation, newspapers, television, the radio.

24 You are further admonished not to form
25 or express any opinion on any subject connected

1 with the trial, until the case is finally submitted
2 to you.

3 We'll see you here tomorrow and we'll
4 start at 9:30 with witnesses and we'll get to
5 closing.

6 THE MARSHAL: Rise for the jury.

7 (The jury exited the courtroom.)

8 THE COURT: So we think the jury
9 instructions, if you come at 9:00 o'clock. Okay.
10 I'm trying to remember what we agreed on. I'm
11 relying on you guys on the estimate.

12 Are you going to kind of put a couple
13 together. What I have is one stack and then it
14 looks like six other ones.

15 Do you want me to go get them?

16 MR. MANN: Yeah. Why don't we briefly
17 discuss them so we know kind of where we are.

18 THE COURT: Okay. Let me to get them.
19 Hold on. Austin has them.

20 -oOo-

21 ATTEST: FULL, TRUE AND ACCURATE TRANSCRIPT OF
22 PROCEEDINGS.

23 /s/Gina M Shrader

24 Gina M. Shrader, CCR 647, RPR
25

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