Steven D. Grierson **EWDI** 1 CLERK OF THE COURT ADAM PAUL LAXALT 2 Attorney General Jason Gunnell (Bar No. 13997) 3 Senior Deputy Attorney General State of Nevada Office of the Attorney General 4 555 E. Washington Ave., Ste. 3900 5 Las Vegas, Nevada 89101-1068 P: (702) 486-3904 F: (702) 486-0660 6 Jgunnell@ag.nv.gov Attorneys for the State of Nevada 8 DISTRICT COURT 9 CLARK COUNTY, NEVADA 10 STATE OF NEVADA, Case No. C-17-322203-1 11 Dept. No. XXV Plaintiff, 12 ٧. 13 THOMAS ARVEL BENSON, a.k.a. thomas benson, a.k.a. THOMAS A. BENSON, 14 a.k.a. THOMAS SKAGGS; ID# 2540455 15 Defendant. 16 17 STATE'S OF NEVADA'S DESIGNATION OF EXPERT WITNESS COMES NOW, Attorney General, Adam Paul Laxalt, by and through Senior Deputy Attorney 18 General, Jason Gunnell, on behalf of the State of Nevada, in accordance with NRS 174.234 provides 19 notice that the State intends to call an expert witness in the above- reference matter as follows: 20 21 1. Detective Kenneth Mead c/o Office of Attorney General 22 555 E. Washington Ave., Ste. 3900 Las Vegas, NV 89101 23 24 Detective Kenneth Mead will testify how the Defendant's demonstrated conduct and the 25 behaviors he has exhibited are similar to sovereign citizen ideology. Detective Mead's testimony, in 26 part, will educate the trier of fact, because he will explain sovereign citizen ideology and beliefs. 27 Detective Mead will testify about how sovereign citizens believe they do not have to answer to 28 any government authority, including courts, taxing entities, motor vehicle departments, or law

Electronically Filed 9/1/2017 2:38 PM

Page 1 of 3

27

28

enforcement. Sovereign citizens subscribe to a belief in "common law" and their right to arrest or sue employees of the "illegitimate government." They hold illegal courts that issue warrants for judges and police officers. Additionally, sovereign citizens clog up the court system with frivolous lawsuits and liens against public officials to harass them. Similarly, Detective Mead will testify about how individuals who exhibit sovereign citizen tendencies and ideology have engaged in violent acts to include the physical assault and murder of law enforcement.

Furthermore, Detective Mead will testify about how certain individuals who exhibit sovereign citizen tendencies and ideology believe in "shadow" governments such as the Continental United [sic] States of America or the Republic of United States of America. Individuals who believe in "shadow" governments maintain an opinion that they can be self-appointed Marshals and/or Judges in some cases. They believe their Marshals have the authority to arrest and detain individuals, and their judges have the authority to grant judicial orders. The Defendant has professed to law enforcement he is a Marshal for the Continental United [sic] States of America.

Finally, Detective Mead will testify that based upon his training, education, and experience in investigating crimes committed by individuals who align themselves with sovereign citizen ideology, and believe in "shadow" governments have a tendency to commit crimes to include violent acts against law enforcement.

Detective Mead's curriculum vitae is attached as Exhibit "1" to this notice. Copies of all reports made by or at the direction of the expert witness have been provided in discovery. Exhibit "2" is a transcript of Detective Mead's testimony from Case No. C-17-325623 where he provided testimony in regards

Dated this 1st day of September, 2017.

SUBMITTED BY:

ADAM PAUL LAXALT Attorney General

By: /s/ Jason Gunnell JASON GUNNELL (Bar No. 13997)

Senior Deputy Attorney General

CERTIFIED COPY TRUE AND CORRECT COPY OF THE ORIGINAL ON FILE

Page 2 of 3

CLERK OF THE COURT

## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing State of Nevada's Designation of Expert Witness with the Clerk of Court by using the electronic filing system on the 1st day of September, 2017.

I certify that some of the participants in the case are not registered electronic filing system users.

I have mailed the foregoing document by First-Class Mail, postage prepaid, or via facsimile transmission or e-mail; or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following unregistered participants:

Michael Wilfong 390 S. Third Street #226 Las Vega, NV 89155

/s/ Lanette Davis

Lanette Davis, an employee of the office of the Nevada Attorney General