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COMMONWEALTH OF MASSACHUSETTS
SUPERIOR COURT
DOCKET NO: 2282CR0117
CLERK OF THE COURTS
NORFOLK COUNTY

NORFOLK, SS.

COMMONWEALTH

V.

KAREN READ

COMMONWEALTH'S PRE-TRIAL MEMORANDUM

1. STATEMENT OF FACTS

On the morning of January 29, 2022, at approximately 6:04 a.m., the Canton Police Department received a 911 call reporting an unresponsive male party in the snow outside a residence at 34 Fairview Road within their town. Officers responded and discovered the male party, subsequently identified as John O'Keefe off the roadway in the front lawn area. Officers identified three women with Mr. O'Keefe, one of whom was the defendant, Karen Read, the girlfriend of Mr. O'Keefe. The defendant had been with Mr. O'Keefe the previous evening at two different bars in Canton and had driven with him to this residence in the early morning hours of this date. Mr. O'Keefe was treated by paramedics from the Canton Fire Department and transported to the Good Samaritan Medical Center, where he was subsequently pronounced deceased. The Commonwealth alleges that the defendant struck Mr. O'Keefe with her vehicle, earlier that morning, and then left the scene, while Mr. O'Keefe lay injured in the snow during a blizzard.

The defendant denies that she has committed any crimes.

2. STIPULATIONS

None.

3. PROPOSED EXHIBITS

- a. Certified copy of death certificate of John O'Keefe
- b. Copy of MSPCL Serum/Plasma Conversion Report
- c. Copy of MSPCL Retrograde Extrapolation Report
- d. Copy of 911 calls
- e. Copy of Canton Police Department photos
- f. Copy of RING videos from One Meadows Avenue, Canton
- g. Copy of video surveillance from Waterfall Bar & Grille
- h. Copy of receipt from Waterfall Bar & Grille
- i. Copy of surveillance video from C.F. McCarthy's
- j. Copy of receipts from C.F. McCarthy's
- k. Copy of MSPCL CSSS photos
- l. Copy of MSP scene photos – SERT search
- m. Copy of surveillance video from Canton Town Library
- n. Copy of MSPCL CSSS vehicle diagram
- o. Copy of MSP SERT Unit diagram
- p. Copy of OCME autopsy photos
- q. Copy of Cellebrite extraction report of cell phone of Jennifer McCabe
- r. Copy of Cellebrite extraction report of cell phone of Kerry Roberts
- s. Copy of Cellebrite extraction report of cell phone of John O'Keefe
- t. Copy of Cellebrite extraction report of cell phone of Karen Read
- u. Copy of Cellebrite extraction report of cell phone of Jennifer McCabe from January 28-29, 2022
- v. Copy of Cellebrite extraction report of cell phone of Kerry Roberts from January 28-29, 2022
- w. Copy of Cellebrite extraction report of cell phone of John O'Keefe, phone calls to and from Karen Read from January 29, 2022

- x. Copy of Cellebrite extraction report of cell phone of John O'Keefe, voicemails from Karen Read on January 29, 2022
- y. Copy of MSP CARS Section vehicle testing video
- z. Certified copy of RMV documents for MA Reg. #: 3GC684
- aa. Copy of MSP CARS Section diagrams
- bb. Copy of OCME body and head diagrams
- cc. Copy of MSP CARS Section Bosch CDR download
- dd. Clothing, including hat and sneakers of John O'Keefe
- ee. Copy of cell phone extraction of communications of Brian Higgins
- ff. Copy of Verizon cell phone records of Karen Read
- gg. Copy of Verizon VoLTE records of cellSites diagrams for Karen Read's phone
- hh. Copy of Verizon RTT records diagrams for Karen Read's phone
- ii. Certified copy of medical records of John O'Keefe from Good Samaritan Medical Center
- jj. Certified copy of medical records of Karen Read from Good Samaritan Medical Center
- kk. Copy of Canton Police Department cruiser camera videos
- ll. Copy of MSP Body Worn Camera Footage, from June 9, 2022
- mm. Copy of Canton Police Department scene search video
- nn. Copy of diagram of John O'Keefe's GPS points
- oo. Copy of MSPCL photos of lab work
- pp. Copy of MSP CARS Section Toyota Techstream, ACM, and VCH data
- qq. Copy of Canton Police Department surveillance video
- rr. Copy of video from residence in Dighton
- ss. Taillight from Defendant's Vehicle
- tt. Taillight pieces recovered from scene
- uu. Cocktail glass recovered from scene
- vv. Victim's cellphone

4. **LEGNTH OF TRIAL**

Five to Six Weeks.

5. **COMMONWEALTH WITNESS LIST**

Police Officers

1. Trooper Michael Proctor
Massachusetts State Police;
2. Sgt. Yuriy Bukhenik
Massachusetts State Police;
3. Trooper Zachary Clark
Massachusetts State Police;
4. Trooper Connor Keefe
Massachusetts State Police;
5. Trooper David DiCiccio
Massachusetts State Police;
6. Trooper Christopher Moore
Massachusetts State Police;
7. Trooper Matthew Dunne
Massachusetts State Police;
8. Lt. Brian Tully
Massachusetts State Police;
9. Trooper Nicholas Guarino
Massachusetts State Police;
10. Trooper Joseph Paul
Massachusetts State Police;
11. Officer Steven Saraf
Canton Police Department;
12. Officer Stephen Mullaney
Canton Police Department;

13. Sergeant Sean Goode
Canton Police Department;
14. Sergeant Michael Lank
Canton Police Department;
15. Lieutenant Paul Gallagher
Canton Police Department;
16. Lieutenant Charles Ray
Canton Police Department;
17. Lieutenant Kevin O'Hara
Massachusetts State Police;
18. Officer Nicholas Barros
Dighton Police Department;
19. Sergeant Brian Gallerani
Needham Police Department;
20. Trooper Evan Brent
Massachusetts State Police;
21. Trooper Everton DeCastro
Massachusetts State Police;
22. Trooper Justin Pye
Massachusetts State Police;
23. Captain Eric Benson
Massachusetts State Police

Civilian Witnesses

24. Heather Maxon
Plainville, MA;
25. Anthony Flematti
Canton Fire Department;
26. Doctor Irini Scordi-Bello
Office of the Chief Medical Examiner;
27. Doctor Renee Stonebridge
Office of the Chief Medical Examiner;

28. Timothy Nuttall
Canton Fire Department;
29. Francis Walsh
Canton Fire Department;
30. Matthew Kelly
Canton Fire Department;
31. Gregory Woodbury
Canton Fire Department;
32. Katie McLaughlin
Canton Fire Department;
33. Jason Becker
Canton Fire Department;
34. Daniel Whitley
Canton Fire Department;
35. Wendell Robery
Canton Fire Department;
36. Jennifer McCabe
Canton, MA;
37. Matthew McCabe
Canton, MA;
38. Allison McCabe
Canton, MA;
39. Kerry Roberts
Canton, MA;
40. Curt Roberts
Canton, MA;
41. Paul O'Keefe
West Bridgewater, MA;
42. Erin O'Keefe
West Bridgewater, MA;

43. Juvenile with initials K.F.
Canton, MA;
44. Juvenile with initials P.F.
Canton, MA;
45. Michael Camerano
Canton, MA;
46. Katherine Camerano
Canton, MA;
47. Brian Higgins
Sandwich, MA;
48. Brian Albert
Norwood, MA;
49. Nicole Albert
Norwood, MA;
50. Brian Albert, Jr.
Norwood, MA;
51. Ian Whiffin
Alberta, Canada;
52. Doctor Justin Rice
Good Samaritan Medical Center;
53. Daisy Ormseth, NP
Good Samaritan Medical Center;
54. Kathleen Wilfert, RN
Good Samaritan Medical Center;
55. Doctor Garrey Faller, Medical Director
Good Samaritan Medical Center;
56. Teri Kun
UC Davis Veterinary Lab;
57. Nicholas Bradford
BODE Technology;

58. Tess Chart
BODE Technology;
59. Julie Albert
Canton, MA;
60. Christopher Albert
Canton, MA;
61. Colin Albert
Canton, MA;
62. Ryan Nagel
Canton, MA;
63. Tristin Morris
Easton, MA;
64. Caitlin Albert
Easton, MA;
65. Gretchen Voss
Boston, MA;
66. Louis Jutras
Canton, MA;
67. Nicholas Roberts
Massachusetts Office of Alcohol Testing;
68. Sara Levinson
Canton, MA;
69. Andre Porto
Massachusetts State Police Crime Lab;
70. Ashley Vaillier
Massachusetts State Police Crime Lab;
71. Maureen Hartnett
Massachusetts State Police Crime Lab;
72. Christina Hanley
Massachusetts State Police Crime Lab;

73. Sophie Hryzan
Massachusetts State Police Crime Lab;
74. Brian Loughran
Canton, MA;
75. Richard D'Antuono
Canton, MA;
76. Jean DeMulis
Canton, MA;
77. James Sullivan
Canton, MA;
78. Steven Bernstein
Stoughton, MA;
79. Julianna Nagel
Canton, MA;
80. Nicholas Kolokithas
Canton, MA;
81. Michael Trotta
Canton, MA;
82. Rebecca Trayers
Canton, MA;
83. Brigid Meehan
Canton, MA;
84. Jessica Hyde
Bridgeport, NY;
85. Marietta Sullivan
Pembroke, MA;
86. Karina Kolokithas
Canton, MA;
87. Laura Sullivan
Pembroke, MA;

6. **Defendant's Witness List.**

Respectfully Submitted,

/s/ Adam C. Lally

Adam C. Lally
Assistant District Attorney
Norfolk District Attorney's Office

/s/ Laura H. McLaughlin

Laura McLaughlin
Assistant District Attorney
Norfolk District Attorney's Office

Date: April 15, 2024

DEFENSE WITNESS LIST

Ms. Read also reserves the right to call any of the witnesses included on the Commonwealth's witness list.

1. Brian Albert – Norwood, MA
2. Caitlin Albert – Easton, MA
3. Christopher Albert – Canton, MA
4. Colin Albert – Canton, MA
5. Julie Albert – Canton, MA
6. Kevin Albert – Canton, MA
7. Nicole Albert – Norwood, MA
8. Michael Wagner – Foxboro, MA
9. Sheryl Waugh – Canton, MA
10. Paul Mackowski – Melrose, MA
11. Leslie Bernstein – Canton, MA
12. Rebecca Baizen – Canton, MA
13. Officer Nicholas Barros – Dighton Police Department
14. Officer Paul Beaudoin – Dighton Police Department
15. Former Chief of Canton Police Department Kenneth Berkowitz
16. Trooper Evan Brent – Massachusetts State Police
17. Sgt. Yuri Bukhenik – Massachusetts State Police
18. Laurie Cahill – Worcester, MA
19. Trooper Zachary Clark – Massachusetts State Police
20. Christopher Curran – Canton, MA
21. Kerri Curran – Canton, MA
22. Nicholas Curran – West Roxbury, MA
23. Richard D'Antuono – Canton, MA
24. Officer Kelly Dever – Boston Police Department
25. Stephanie Devlin – Massachusetts State Police Crime Lab
26. Trooper David Diccico – Massachusetts State Police
27. Patrick Haggerty – Dighton, MA
28. Maureen Hartnett – Massachusetts State Police Crime Lab
29. Brian Albert, Jr. – Canton, MA
30. Brian Higgins – Sandwich, MA
31. Louis Jutrus – Canton, MA
32. Trooper Connor Keefe – Massachusetts State Police
33. Matthew Kelly – Canton Fire Department
34. Karina Kolokithas – Canton, MA
35. Nicholas Kolokithas – Canton, MA
36. Teri Kun – UC Davis Veterinary Lab

37. Sergeant Michael Lank – Canton Police Department
38. Brian Loughran – Canton, MA
39. Heather Maxon – Plainville, MA
40. Allison McCabe – Canton, MA
41. Jennifer McCabe – Canton, MA
42. Matthew McCabe – Canton, MA
43. Lance Mello – Massachusetts State Police Crime Lab
44. Ryan Nagel – Canton, MA
45. Steve Nelson – Norfolk County District Attorney's Office
46. Andre Porto – Massachusetts State Police Crime Lab
47. Hollie Price – Google, LLC
48. Trooper Kathleen Prince – Massachusetts State Police
49. Elizabeth Proctor – Canton, MA
50. Trooper Michael Proctor – Massachusetts State Police
51. Kerry Roberts – Canton, MA
52. Wendell Robery – Canton Fire Department
53. Steven Ridge – Boston Police Department
54. Heriberto Hernandez – Boston Police Department
55. Marc Lopilato – Canton, MA
56. Alfredo Lopilato – Canton, MA
57. Angela Malvone – Canton, MA
58. Lt. Brian Tully – Massachusetts State Police
59. Courtney Proctor – Canton, MA
60. Tristan Morris – Easton, MA
61. Jean DeMulis – Canton, MA
62. Mary Souza – Dighton, MA
63. Ashley Bell – Canton, MA
64. Mike Rushworth – Thompson Station, TN
65. Matthew Amory – Canton, MA
66. Norfolk County District Attorney Michael Morrissey – Norfolk County District Attorney's Office
67. Thomas Beatty – Canton, MA
68. Erin Beatty – Canton, MA
69. Meghan Mariani – New York, New York
70. Thomas Martin – Weymouth, MA
71. John O'Keefe, Sr. – Braintree, MA

EXPERT WITNESSES

72. Frank Sheridan, M.D. – Forensic Pathologist – San Bernadino, CA

73. Chris Van Ee, PhD. – Expert in Biomedical and Mechanical Engineering – Novi,
MI

74. Richard Green – Expert in Digital Forensics – St. Petersburg, FL

75. Daniel Wolfe, Ph.D. – ARCCA, Inc. – Penns Park, PA

76. Andrew Rentschler, PhD. – ARCCA, Inc. – Penns Park, PA

77. Scott Kline, BSME – ARCCA, Inc. – Penns Park, PA