

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case # 1:22-cr-00121-TNM
	:	
v.	:	
	:	
Jared Paul Cantrell	:	
Quentin G. Cantrell	:	
Eric Andrew Cantrell	:	

Service of Expert Report of Guillermo Cosson

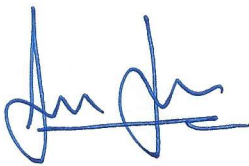
Counsel for Quentin Cantrell (“QGC”) submits the attached expert report (Appendix A) pursuant to the Court’s scheduling order. QGC may seek to introduce the testimony of Guillermo Cosson (“Cosson”) at trial addressing unreliability of the government’s video evidence for the purpose of attempting to establish mens rea on the part of one or more of the defendants.

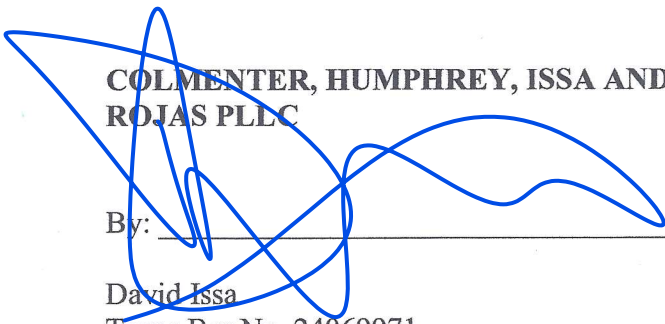
Cosson’s address is:

13707 Harrison Hill Ct  
Houston, TX 77077

Counsel for QGC has concurrently contacted the prosecutor to address the potential deposition of Cosson, and accepts service on his behalf for that purpose.

Counsel undersigned warrants that this document was served by email on February 13, 2023.

  
Guillermo Cosson  
February 15 - 2023

COLMENTER, HUMPHREY, ISSA AND  
ROJAS PLLC  
By:   
David Issa  
Texas Bar No. 24069971

## **Appendix A**

### **I. Potential Expert Opinions**

Counsel anticipates that at trial Cosson may testify to one or more of the following opinions:

1. The videos produced by the government in this case are not reliable representations of the sense impressions of members of the crowd around the location where the video was captured.
2. Videos recorded by 3d parties are particularly unreliable, in part due to the nature of the hardware and software used to capture them, and in part because of the lack of information about how that hardware and software was used. Furthermore, movement in either the recording device, in the hand of the person holding device, or the subject, make the recording even less reliable.
3. The lack of an opportunity to cross-examine the individual who made a video recording makes 3d party video even less reliable than it might otherwise be.

### **II. Bases and reasons for opinions**

#### **A. Materials reviewed:**

Cosson has reviewed videos in preparation for testifying in the case, including:

YouTube-496fitter.mp4  
IMG\_0781.MOV (in folder "Serial 71")  
YouTube-JosephACamp.mp4

#### **B. Bases for opinions**

1. Video recordings are abstractions that capture only a part of what is happening around them.

2. Video recordings alter the subject matter that they capture—sometimes by design, and sometimes by happenstance.

3. For example, the color or brightness of a video recording may not accurately reflect the appearance that would have been perceived by the naked human eye. This can be the result of the application used to record the video, including such things as filters. Changes to the video can happen either simultaneously or subsequent to the recording.

4. Likewise, audio recordings (either alone or captured as part of a video recording) can alter the subject matter they capture, especially if the device, the person recording, the subject, or objects in the environment are moving.

5. Sound and video in a recording made on a cell phone are often poorly synchronized because of the difference in the speed of sound and the speed of light. Software can try to correct for this, but how well this is accomplished in a particular case is uncertain, particularly when there is no opportunity to review the hardware and software used, and how they were used, to record.

6. For example, recorded sound may be either louder or softer than it would have been perceived to the naked human ear. This can be the result of amplification during recording or playback. Amplification during recording can vary greatly due to directional microphones, which are typical of cell phones. Directional microphones alter the volume of sound recordings as a function of the direction of the sound, relative to the directional mic. In particular, interference with the hand of the person recording and the microphone can either serve to amplify or dampen sound.

7. The impact of frequency dependency and of software can also result in audio recording that differs substantially from what a nearby individual might have heard. For example, the use

of filters in a noisy environment can render speech intelligible that would have been difficult or impossible to understand by an unassisted human. This can be true even when the effect of the filter is to reduce the amplitude of the speech itself, by improving the signal-to-noise ratio of the recorded speech.

### **III. Qualifications**

#### **A. Education**

New Mexico State, BA in Business Computer Systems (1998)

International MBA from Georgetown and Escuela Europea de Estudios Universitarios y de Negocios (2006)

#### **B. Experience**

25 years of experience in Information technology

~2006-2009: Consultant developing decision support centers, particularly in oilfield service companies (e.g. Shell, Talisman, and Science Applications International Corporation, Inc.)

2009-present: Chevron (various roles, presently Asset Management Deployment Lead)

#### **C. Publications/Awards/Certifications**

1. Certified App Developer in iOS(Apple) and Android Technology.
2. Designed, developed and published mobile applications.
3. Apps published for cell phones include:
  - a. App Domino
  - b. Fantasy Tennis Club

**IV. List of Other Cases in Which Cosson Has testified**

Cosson has not testified in any other cases, either at trial or by deposition, in the past four years.

**V. Compensation**

Cosson is being compensated at a rate of \$200 per hour.