



**UNITED STATES MARINE CORPS**  
CHIEF DEFENSE COUNSEL OF THE MARINE CORPS  
MARINE CORPS DEFENSE SERVICES ORGANIZATION  
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5816  
CDC  
27 Apr 22

**CDC Policy Memo 4.4**

From: Chief Defense Counsel of the Marine Corps  
To: Distribution List

Subj: MARINE CORPS DEFENSE SERVICES ORGANIZATION INVESTIGATOR  
PROGRAM

Ref: (a) JAGINST 5803.1E

Encl: (1) DSOI Training Requirements  
(2) DSOI Identification Document  
(3) DSOI Template - Investigation Request  
(4) DSOI Template - Report of Investigative Action  
(5) DSOI Template - Investigator Case Chronology  
(6) DSOI Template - Attorney Work Product Memo  
(7) DSOI Template - DSOI Case Log

1. Purpose. To establish a uniform policy for the Marine Corps Defense Services Organization Investigator (DSOI) program.

2. Applicability. This memorandum applies to all Defense Services Organization (DSO) personnel. Regional Defense Counsel (RDC) are encouraged to issue supplemental guidance and regional procedures consistent with this Policy Memorandum.

3. Background. Pursuant to Section 540J of the Fiscal Year 2020 National Defense Authorization Act, Headquarters Marine Corps, Judge Advocate Division (JAD) created the DSOI program to provide the DSO with investigative litigation support. The DSOI program was established in order to: make the military justice system more effective in providing an effective defense for an accused; and make the military justice system fair and efficient.

4. Defense Services Organization Investigator (DSOI) Positions.

a. The Chief Defense Counsel for the Marine Corps (CDC), with advice from the DSO regional leaders and Attorney Advisors (AAs), is responsible for hiring all DSOI. Each DSOI will be a civilian General Schedule (GS) employee. As civilian GS employees, DSOI must abide by the relevant requirements, restrictions, and regulations applicable to Department of the Navy civilian GS employees. The DSOI serve under the supervision and direction of their RDC. They are members of the defense team working in the best interest of

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assigned military clients in coordination with military defense counsel as described below.

b. DSOI are not law enforcement agents, do not represent the United States Government, and shall not hold themselves out as such.

c. As members of the defense team, the DSOI are subject to attorney-client and work product privileges and confidentiality; therefore, the DSOI must understand and abide by the rules governing these throughout the execution of their duties.

d. DSOI are regional assets. The RDC shall determine which cases require DSOI investigative assistance and shall be responsible for the assignment of DSOI to provide assistance.

e. Upon assignment by the RDC, the DSOI shall thoroughly and professionally investigate the case in a timely manner. The DSOI's primary responsibilities are to act under the guidance of the client's military counsel; to determine appropriate investigative steps and follow-on actions; and to employ expert case analysis to assist the client's defense counsel.

f. The DSOI have the responsibility of assisting the military defense counsel. The DSOI should develop an investigative plan for each case to which they are assigned. Additionally, the military defense counsel may direct specific investigative actions in the best interest of the client. The DSOI shall assist the military defense counsel by:

(1) establishing working relationships with federal, state, and local law enforcement agencies involved with the assigned case(s);

(2) coordinating with law enforcement agencies and other offices and entities to review seized or produced evidence;

(3) compiling and analyzing information, documents, photographs, and other items relevant to the defense case, and visiting, reviewing, and documenting pertinent locations;

(4) searching for, documenting, and evaluating physical evidence;

(5) locating and interviewing witnesses and law enforcement personnel;

(6) facilitating written statements and drafting summaries of witness interviews;

(7) identifying appropriate experts and consultants;

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(8) obtaining and examining relevant background checks including through records and databases analyses;

(9) assisting military counsel with the preparation and presentation of matters in defense, extenuation, mitigation, and/or clemency;

(10) preparing accurate and timely reports related to the above when requested by military defense counsel;

(11) providing testimony at a court, preliminary hearing, or other hearing related to the assigned tasks; and

(12) completing other pertinent research as directed and executing other tasks as assigned and approved by the RDC in the best interest of the client.

g. It is the responsibility of the DSOI to ensure that each investigative assignment is completed in a timely, effective, and efficient manner, providing a professional quality work product.

h. Upon employment, each DSOI shall be issued a standard identification document that conforms to the template in enclosure (2). While in the exercise of their duty and responsibilities, the DSOI shall have on their person the standard identification document. Upon termination of employment, the DSOI shall surrender their issued standard identification document to the RDC or another designated member of the DSO.

#### 5. Supervisory Responsibility.

a. The CDC maintains overall responsibility for the DSOI program. The CDC will serve as the second-line supervisor for all DSOI and ensure the RDCs conduct appropriate performance and employment evaluations.

b. RDCs are the first line supervisors for DSOI and are responsible for DSOI assignment, task prioritization, training, and evaluation. DSOI performance evaluations shall not be delegated below the RDC level. The RDC is encouraged to seek input from military defense counsel with whom the DSOI has worked, senior defense counsel (SDC), and AAs on the DSOI's performance.

c. Military defense counsel are ultimately responsible for the investigation of their case. As such, military defense counsel task and supervise the conduct of case-related investigative assignments including those executed by an assigned DSOI. Military defense counsel are responsible for the conduct of the DSOI and shall maintain oversight over the case-specific DSOI activities even where a civilian defense counsel is serving as lead counsel. Military defense counsel shall ensure the DSOI is meeting case

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objectives, acting within the assigned parameters, and abiding by relevant regulations and rules of professional responsibility.

d. When assigned to a specific case, the DSOI is a member of that defense team and must comply with all rules of professional responsibility, including reference (a) and the military defense counsel's state bar rules.

e. The RDC maintains overall responsibility for the DSOI and their professional conduct. If the DSOI becomes the subject of a professional misconduct complaint, the DSOI must inform the RDC and, if applicable, the relevant military defense counsel for the case at issue. If the subject of any other criminal or civil complaint, investigation, arrest, protective order/restraining order, conviction, or lawsuit, the DSOI must inform the RDC. The RDC shall notify the CDC as a standard Critical Information Report (CIR) regarding any complaint or incident covered by this paragraph.

## 6. Funding.

a. Funding for the DSOI comes primarily from two sources.<sup>1</sup> Specific case-related expenses, including travel, are the responsibility of the Convening Authority (CA).<sup>2</sup> Prior approval from the CA is required before incurring case-specific expenses. Requests for CA funding are submitted by the military or civilian defense counsel to the CA. A CA's adverse response to such requests is subject to a motion for appropriate relief.

b. JAD is responsible for training and equipping DSOI. All purchase or funding requests related to DSOI training and general support (e.g., equipment, database access) shall be submitted by the RDC to the CDC office for endorsement and submission to JAD.

c. DSOI work spaces and day-to-day office and administrative supplies and furnishings will be sourced through the relevant Legal Services Support Section (LSSS).

7. Cross-Regional DSOI Assignment. Marine Corps units and personnel are dispersed globally and alleged criminal conduct is not geographically restrained; therefore, witnesses and evidence may be located outside of DSOI's assigned region. To increase efficiency and reduce travel requirements, military defense counsel may request assistance from DSOI assigned to other regions. The request will be addressed to the out-of-region RDC for decision and shall include requested tasks and court-ordered motion and trial dates.

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<sup>1</sup> Nothing in this document shall be interpreted to preclude any Department of Defense department, service, agency, or unit from providing resources to support the DSOI program, to include the provision of equipment or training.

<sup>2</sup> A budget for case-related expenses not funded by the CA is currently in development for the DSO.

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8. Use of DSOI in Cases Outside of the DSO Area of Responsibility (AOR). At the discretion of the supervising RDC, a DSOI may be assigned to a case convened by a sister service and other cases outside the DSO's AOR. However, a DSOI shall only be assigned to such cases when the military defense counsel assigned to the case is a member of the Marine Corps DSO. All other requests for DSOI support outside of DSO AOR are determined solely by the CDC. Funding, if necessary, for non-Marine Corps DSO AOR DSOI support shall be secured prior to assignment of DSOI.

9. DSOI Assignment.

a. To ensure uniform assignment actions across the DSO, the CDC shall establish procedures for the assignment of DSOI. At a minimum, the assignment procedures will establish the manner in which DSOI will be assigned and the method for documenting and resolving conflicts.

b. The RDC is the assigning authority for the DSOI. The DSOI shall be assigned prior to the performance of any case-specific tasks. The DSOI may perform initial investigative screenings or case review prior to assignment at the direction of the RDC.

c. Factors to consider when assigning DSOI include, but are not limited to: case complexity, merits, procedural posture, investigative need, and likely disposition; the DSOI's workload, expertise, and current conflict(s); the requesting military counsel's experience, workload, and current conflict(s); and the needs of the region. RDCs, in consultation with the DSOI, AA, and SDC, will evaluate the request to estimate the expected work-effort likely to be required of the DSOI pursuant to the request.

d. Military defense counsel shall request DSOI investigative support by completing and submitting enclosure (3) to the RDC. If a military defense counsel's request for DSOI assignment is declined, the RDC shall provide, in writing, the reason(s) for the denial.

e. Should the RDC be detailed to a case where there exists a conflict with a subordinate counsel's case, the CDC shall serve as the DSOI's assignment authority for all related conflict cases within the region.

10. Appeal of Denials. A denial by the RDC of DSOI support may be appealed to the CDC for final disposition. Nothing in this policy prohibits a counsel from requesting the CA provide investigative assistance, denials of which may form the basis for a motion for appropriate relief for expert assistance via the normal litigation process.

11. Training Requirements. Prior to a DSOI's initial assignment, the DSOI must complete the training outlined in enclosure (1). Unless

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otherwise noted, all training topics are mandatory. Absent this training, the DSOI will remain unavailable for assignment. DCAP will provide standardized training relevant to the topics outlined in enclosure (1) and provide information on other military and civilian training opportunities. Absent excusal by the CDC, DSOI will attend annual DSO World Wide training. Absent excusal by the RDC, DSOI will attend DSO quarterly regional training.

12. Witness Interviews.

a. Prior to each witness interview, the DSOI shall inform the witness of the following: (1) the DSOI's name and position; (2) that the DSOI works for the DSO; (3) the name of military defense counsel; and (4) the name of the case to which the DSOI is assigned. The DSOI shall also present their standard identification document prior to the witness interview.

b. As an agent of the defense counsel, DSOI are obligated to respect all rights accorded victims by Article 6b, UCMJ, and all implementing regulations.

c. Audio recorded witness interviews shall use official, DSO-controlled audio equipment and comply with applicable state and local rules governing the recording of witness statements.

d. The DSOI will not intentionally misrepresent any facts to a witness in order to obtain statements or information.

13. Obtaining and Storing Evidence. There is almost no circumstance in which a member of the DSO should be in possession of real evidence. DSOI shall become familiar with the policy memorandum on handling real evidence. If any office of the DSO wishes to maintain evidence within its spaces, the office must provide CDC with written procedures for handling of the evidence prior to doing so. The procedures shall include the manner and medium for obtaining, storing and securing evidence, the personnel responsible, and documentation of chain of custody. DSO personnel are specifically prohibited from storing or possessing contraband or other prohibited items in DSO spaces. Contraband and prohibited case related items include, but are not limited to, alcohol, weapons, hazardous chemicals, prescription medicine, and money related to the case. DSOI and military defense counsel should immediately consult with supervisory counsel when faced with requests or opportunities to take possession of real evidence.

14. DSO Investigative Templates. DSOI shall memorialize each case, investigative action, and witness interview using the appropriate DSO Investigative Templates found in enclosures (4)-(7).

15. DSOI Case Chronology. DSOI shall maintain a current case chronology for each case assigned using enclosure (5). At the

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conclusion of the case, the chronology shall be provided to the military defense counsel for inclusion in the case file. The chronology will include a reference list of all investigative reports, witness statements and summaries, and other documents created during the course of the investigation. The chronology will also include all tasks assigned or initiated and their start and conclusion dates thereof.

16. Issuance, Use, and Security of Credentials.

a. The CDC shall issue credentials in the form of the standard identification document, found at enclosure (2), to the DSOI upon completion of initial training.

b. The DSOI is responsible for the security and safeguarding of the issued identification document at all times. The document should remain in the DSOI's immediate possession or locked within the DSOI's residence, office, or lodging. If stored in a vehicle, the identification document will be placed in a location where the document remains out of sight. At no time will identification documents be left in a vehicle overnight.

c. Use of the DSOI standard identification document is strictly limited to official investigative duties directly related to cases to which the DSOI is assigned.

d. Photocopying or otherwise creating physical duplicates of the DSOI standard identification document is prohibited.

e. DSOI will not provide, release, or surrender their standard identification document to anyone, except in the following circumstances:

(1) As required by lawful authority to enter controlled facilities, such as confinement facilities;

(2) Upon suspension or relief from investigative duties by the RDC or CDC; or

(3) When the individual permanently leaves the position as a DSOI.

f. If a DSOI has surrendered the identification document due to suspension or relief, the RDC assumes responsibility for the document. If the DSOI is returned to duty, the credentials will be returned. If not returned, the RDC will destroy the DSOI identification document upon notice to the CDC.

g. A DSOI whose identification document is lost or damaged will immediately report the loss or damage to the RDC, who will notify the CDC.

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(1) The CDC may order an inquiry into the circumstances surrounding the loss or damage to the credentials.

(2) If the inquiry determines the loss or damage was due to personal negligence, the RDC or CDC may take appropriate action.

(3) The DSOI whose identification was lost or damaged may request re-issuance through their RDC.

h. DSOI must be steadfast in ensuring they are not mistaken for law enforcement or agents of the government, and will not display, provide, or refer to their credentials in any manner that might willfully lead another to believe the DSOI is a law enforcement agent.

17. Weapons. DSOI are not authorized to carry a weapon in the course of their official duties.

18. Workload Data and Reporting. Accurate collection of data on DSOI workload is critical to the evaluation of the scope and effectiveness of the DSOI program. The DSOI and their supervisors will ensure accurate assessment and reporting of DSOI activities and the impact of DSOI on their assigned cases. The DSOI shall maintain case log annotating all cases to which they are assigned. The log shall, at a minimum, include case name, disposition, date assigned, date of final disposition, general nature of the allegation(s) and investigative steps, and estimated hours worked. The log is an inspectable item and must be available to the RDC. A copy of the log must be provided to the RDC upon voluntary or involuntary termination of the investigator as a DSOI. The log may be used by the RDC to estimate future requirements, balance DSOI caseload, establish tasking priorities, and, if necessary, request additional investigative personnel. See enclosure (7).

19. This policy remains in effect until superseded in writing. The point of contact for proposed changes or questions regarding this memorandum is Officer-in-Charge, DCAP.



V. C. DANYLUK

**TRAINING REQUIREMENTS FOR DEFENSE SERVICES ORGANIZATION**  
**INVESTIGATORS AND COUNSEL**

- Signature of trainer or supervisor and date of completion is required in each block.
- Requirement parenthetical reflects the entity executing, facilitating, or supervising the training (DCAP, RDC, or Regional DSO). Regional DSO portions allow the line defense counsel and legal support specialists to discuss topics and assist the DSOI in the training process. Counsel and clerk availability and topics should be coordinated with the SDC. DSOI & RDC are required to sign upon completion. This is an Article 6 Inspection item.

**DSOI INTRODUCTIONS**

- In-call with RDC, within 1 day of reporting (RDC) \_\_\_\_\_
- In-call with Regional Attorney Advisor within 1 day of reporting (RDC) \_\_\_\_\_
- In-call with LSSS OIC, within 1 week of reporting (RDC) \_\_\_\_\_
- In-call with NCIS SAIC or ASAIC, accompanied by RDC, within 1 week of reporting (RDC) \_\_\_\_\_
- In-call with confinement facility OIC, accompanied by RDC, within 2 weeks of reporting (RDC) \_\_\_\_\_
- In-call with Base or Installation CO accompanied by RDC, within 2 weeks of reporting (RDC) \_\_\_\_\_
- Submit biography to DSO Chief for access to SharePoint (RDC) \_\_\_\_\_
- In-call with CDC (RDC) \_\_\_\_\_

**DSOI OVERVIEW**

- Review of job responsibilities and requirements, within 1 week of reporting (RDC) \_\_\_\_\_
- Review of Performance Plan (RDC) \_\_\_\_\_

**PROFESSIONAL RESPONSIBILITY**

- Training on Professional Responsibility rules in JAGINST 5803.1E relevant to using DSOI (DCAP) \_\_\_\_\_
  - Rule 5.3 (responsibilities regarding non-attorney assistants)
  - Rule 1.7-1.9 (conflict of interest)
  - Rule 3.3 (candor to the tribunal)
  - Rule 4.1 (truthfulness in statements to others)

- Rule 4.2 (communication with person represented by counsel)
- Rule 4.3 (dealing with unrepresented person)
- Rule 4.4 (respect for rights of third persons)

Review and discuss with RDC the JAGINST 5803.1E (RDC) \_\_\_\_\_

**ATTORNEY CLIENT PRIVILEGE AND WORK PRODUCT PRIVILEGE**

Training on Attorney Work Product and Privileged Communications (DCAP) \_\_\_\_\_

- JAGINST 5803.1E, Rule 1.6
- M.R.E. 502 (lawyer-client privilege)
- Work Product Privilege

**DISCOVERY OBLIGATIONS**

Training on discovery obligations and their relation to Attorney Work Product and Privileged Communications (DCAP) \_\_\_\_\_

- Article 46, UCMJ
- R.C.M 701
- R.C.M 914
- M.R.E. 612
- M.R.E 613a

Training on DSO Investigative Templates (DCAP) \_\_\_\_\_

**MILITARY JUSTICE OVERVIEW**

Overview of Court-Martial Process (Regional DSO) \_\_\_\_\_

- Preferral and Referral of charges
- Article 32 Hearing
- Jurisdictional requirements (Subject Matter and Personal)
- SCM, SPCM and GCM procedures and differences
- Pre-sentencing hearings
- Post-trial processing
- Appellate review

Overview of Manual for Courts-Martial (Regional DSO) \_\_\_\_\_

- Uniform Code of Military Justice
- Rules for Court-Martial
- Military Rules of Evidence

**OBSERVATION**. Observe each of the following within 30 days or as excepted by the RDC when unavailable

Article 32 hearing (Regional DSO) \_\_\_\_\_

Court-martial arraignment (Regional DSO) \_\_\_\_\_

Court-martial motions hearing (Regional DSO) \_\_\_\_\_

- Court-martial witness testimony (preferably law enforcement or expert witness) (Regional DSO) \_\_\_\_\_
- Court-martial pre-sentencing hearing (Regional DSO) \_\_\_\_\_

**WITNESS INTERVIEWS**

- Training on witness interview requirements (DCAP) \_\_\_\_\_
- Training on requirements for recording witness interviews (DCAP) \_\_\_\_\_
- Training on documenting witness interviews (DCAP) \_\_\_\_\_

**MISC. MATTERS**

- Overview of JAD, LSSS, DSO, and NMCCA structure (Regional DSO) \_\_\_\_\_
- Overview of local NCIS, USMC CID, PMO, and other military law enforcement (Regional DSO) \_\_\_\_\_
- Overview of military ranks, customs and courtesies (Regional DSO) \_\_\_\_\_

**\*\*\*All of the above tasks must be completed prior to commencing any of the below Case Evaluation and Management tasks unless noted above\*\*\***

**CASE EVALUATION AND MANAGEMENT**

Under the supervision of RDC, perform the following as the assigned investigator for a preferred case:

- Review discovery, transcripts, and recordings
- Discuss theory of innocence with counsel
- Prepare investigation plan
- Identify, prioritize, and locate key witnesses
- Conduct interviews and complete investigative steps
- Complete and provide applicable DSO forms

**CERTIFICATION OF COMPLETION**

I hereby certify that the above requirements were completed by me on the stated dates.

\_\_\_\_\_  
\_\_\_\_\_

Defense Service Investigator

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

I hereby certify \_\_\_\_\_ completed the above training requirements and may be assigned to ongoing cases and receive a Defense Services Investigator Identification Document.

\_\_\_\_\_  
\_\_\_\_\_

Regional Defense Counsel

Print Name: \_\_\_\_\_

Date: \_

Copy to:  
DCAP



# Marine Corps Defense Services Organization



**PHOTOGRAPH  
OF DSOI**

Jack T. DSOI

## **AUTHORITY**

- **10 U.S.C. § 827b:** Entitle service members to the representation of qualified counsel at courts-martial.
- **10 U.S.C. § 846:** Provides the defense an equal opportunity to obtain witnesses and other evidence in preparation for the defense's case.

The Marine Corps Defense Services Organization Investigator is a member of the defense team acting on behalf of an individual client under the supervision of a qualified defense counsel and is authorized to act in furtherance of the references.

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Rank John E. Doe, USMC  
Chief Defense Counsel  
of the Marine Corps



# DEFENSE SERVICES ORGANIZATION INVESTIGATOR REQUEST

CLIENT NAME/RANK: \_\_\_\_\_ CHARGE(S): \_\_\_\_\_  
DETAILED COUNSEL: \_\_\_\_\_ OFFICE: \_\_\_\_\_  
DATE REQUESTED: \_\_\_\_\_ DATE REQUIRED: \_\_\_\_\_ NEXT HEARING: \_\_\_\_\_ PTC? Y / N

**PROSECUTION THEORY & SUPPORTING FACTS:**

**DEFENSE THEORY & SUPPORTING FACTS:**

**SPECIFIC INVESTIGATIVE SUPPORT REQUESTED (CHECK ALL THAT APPLY):**

| TYPE                             |           | DETAILS |
|----------------------------------|-----------|---------|
| Discovery review                 | PAGES:    |         |
| Interview/interrogation review   | HOURS:    |         |
| Witness interview                | NUMBER:   |         |
| Witness background investigation | NUMBER:   |         |
| Scene visit/documentation        | LOCATION: |         |
| Case related travel              | LOCATION: |         |
| Exhibit preparation              | TYPE:     |         |
| Attorney consultation            |           |         |
| Attend murderboard               |           |         |
| Other (specify)                  |           |         |

APPROVED? Y / N      APPROVAL AUTHORITY: \_\_\_\_\_      DATE: \_\_\_\_\_

DENIAL JUSTIFICATION: \_\_\_\_\_



# DEFENSE SERVICES ORGANIZATION REPORT OF INVESTIGATIVE ACTION

CLIENT NAME/RANK: \_\_\_\_\_ CHARGE(S): \_\_\_\_\_

DETAILED COUNSEL: \_\_\_\_\_ OFFICE: \_\_\_\_\_

INVESTIGATOR: \_\_\_\_\_ ACTION TYPE: \_\_\_\_\_ DATE: \_\_\_\_\_

## ATTACHMENTS:

(a) Statement of [Witness] dtd DD MMM YYYY

(b)

## NARRATIVE OF ACTION TAKEN:

[On the above date and time, I conducted a [telephonic, in person, video teleconference...] interview of \_\_\_\_\_ . Prior to the interview, I identified myself as a member of the Defense Services Office [location] and that I was assigned to the defense team in the case of United States v. \_\_\_\_\_ , working in support of [defense counsel]. After identifying myself, the witness agreed to speak with me. At the conclusion of the interview, the witness provided a written statement, documented in Attachment (a).]

[On the above date and time, I visited the scene of the alleged assault, 3303 Lava Court #12, Desert Queen neighborhood, MCAGCC 29 Palms. I took 24 photographs of the interior of the residence utilizing a DSO Canon Powershot digital camera, documented in Attachment (b). I also documented the scene as it appeared and conducted measurements of the downstairs bedroom and living room, documented in Attachment (b).]

**IMPORTANT.** This template is used to document and summarize investigative actions taken (e.g. who, what, where, when, and how of the witness interview), NOT to either record impressions or recommend further action. This form may be discoverable or otherwise used to refresh a witness's memory or to impeach or bolster a witness's credibility. Therefore, it is important to avoid entering attorney-client privileged information or attorney work product on this report. **Impressions, thoughts, and recommendations for further action should be noted separately utilizing enclosure (6) (Attorney Work Product Memo).**



# DEFENSE SERVICES ORGANIZATION INVESTIGATOR CASE CHRONOLOGY

CLIENT NAME/RANK: \_\_\_\_\_ CHARGE(S): \_\_\_\_\_

DETAILED COUNSEL: \_\_\_\_\_ OFFICE: \_\_\_\_\_

INVESTIGATOR: \_\_\_\_\_ DATE ASSIGNED: \_\_\_\_\_

## ATTACHMENTS:

- (a) Summary of interview of Sgt William J. Allen, USMC
- (b) Statement of Sgt William J. Allen, USMC dtd 02 Jul 2022
- (c) Diagram of living room, 3303 Lava Court #12, Desert Queen neighborhood, MCAGCC 29 Palms
- (d) Photos of exterior, 3303 Lava Court #12, Desert Queen neighborhood, MCAGCC 29 Palms

## SUMMARY:

[Description of assigned task(s) in chronological order to include the date and task executed, as they are completed]

1. **26 Jun 2022.** I was assigned to the subject case by the Regional Defense Counsel-West.
2. **26 Jun 2022.** I conducted an open-source computer check to determine the location of possible witness(s) in the matter and located Sgt William J. Allen, USMC, who was reported by the client to have witnessed the allegations.
3. **28 Jun 2022.** I telephonically contacted Sgt Allen and arranged a time/date for interview (0945 on 2 July 2022 at Starbucks in Vista, CA).
4. **2 Jul 2022.** I conducted an interview with Sgt Allen, after which Sgt Allen voluntarily agreed to provide me with a signed, sworn statement. See Attachments (a) and (b).
5. **7 Jul 2022.** I traveled from Camp Pendleton to MCAGCC 29 Palms (6 hours drive time round trip) to view and document the scene of the alleged offenses, 3303 Lava Court #12, in the Desert Queen Base Housing neighborhood, from approximately 1300 to 1730. I photographed the interior and exterior of the residence, took measurements, and created a diagram. See Attachments (c) and (d).
6. **29 Aug 2022.** Etc.
44. **4 Oct 2022.** I testified in support of a defense motion for a forensic pathologist from approximately 1300 to 1430.
53. **9 Dec 2022.** Case concluded in a full acquittal after a contested trial before members. I spent 3 hours in after-action meeting with defense counsel and attorney advisor.
54. **Total time spent on case:** Travel (6 hours); attorney consultation (10 hours); investigative action (18 hours).



# DEFENSE SERVICES ORGANIZATION ATTORNEY WORK PRODUCT MEMO

CLIENT NAME/RANK: \_\_\_\_\_

CHARGE(S): \_\_\_\_\_

DETAILED COUNSEL: \_\_\_\_\_

OFFICE: \_\_\_\_\_

INVESTIGATOR: \_\_\_\_\_ DATE: \_\_\_\_\_

SUBJECT: \_\_\_\_\_

**IMPORTANT.** Use this document to record attorney-client privileged communications, information or attorney work product. This may include, but is not limited to, the investigator's impressions, thoughts, and recommendations for further action.

