

CIRCUIT COURT OF POLK COUNTY

**State of Tilly**

v.

**Jay Kuang,**

**Defendant.**

**Criminal Case. No. CV 23-24601.**

Judge Ashley Addison

**Stipulations**

1. All parties and witnesses are at least of normal intelligence and none has or ever has had a mental condition that would impact a person's perception, memory, or ability to respond to questions on cross examination.
2. From the moment they signed their affidavits to the beginning of trial, no witnesses have seen, heard, or otherwise learned anything that would cause them to change the information they included in their affidavits.
3. Both parties fully complied with their discovery obligations. No pertinent information or evidence was withheld during discovery. This stipulation does not address demonstrative aids that may be used during trial and will not be admitted into evidence.
4. Within the jurisdiction of Tilly, "Level A Clearance" represents the highest tier of security clearance in the realm of classified information. Individuals with "Level A Clearance" are granted access to the most sensitive and confidential documents, including those related to the Witness Protection Program. This clearance is issued only after rigorous background checks and requires periodic reevaluation.
5. Sheriff Blaine Nickson had probable cause to arrest Jay Kuang on August 1, 2022. Immediately after the arrest, Blaine Nickson informed Jay Kuang of Jay's Miranda rights. There were no violations of Jay Kuang's constitutional rights during or after Jay Kaung's arrest by either Blaine Nickson or N.W. Brooks.
6. On August 1, 2022, Sheriff Blaine Nickson obtained a valid emergency warrant. This warrant covered the entirety of the investigation that the Sherriff conducted after the arrest of Jay Kuang.
7. The U.S. Marshals Service has ensured Jay Kuang's safety since Jay Kuang's arrest. Jay Kuang is testifying voluntarily and is not under any form of duress.
8. The bodies of Rao Maloney, Emily Debnath, and Chad Shapiro were not damaged, tampered with or harmed during their transportation to Little Hamlet General.
9. Both parties agree that Rao Maloney, Emily Debnath, and Chad Shapiro never attempted suicide nor died as a result of suicide.
10. Natalie Schaefer and Braden Benjamin did not suffer from any kind of chemical poisoning on August 1, 2022. Natalie Schaefer and Braden Benjamin are alive.
11. All notice requirements of 902(11) and 902(12) have been satisfied for all exhibits.
12. The parties and witnesses waive all objections arising under the U.S. Constitution.

13. For the convenience of the parties, witnesses, court, and jury, all potential exhibits have been pre-labeled and pre-numbered. Those numbers will be used for all purposes at trial, regardless of which party first offers the exhibit or the order in which the exhibits are offered.
14. Chain of custody was properly documented for all exhibits, and all exhibits have been properly preserved prior to trial.
15. Exhibits 7A to 7E are true and accurate screenshots of Jay Kuang's phone that were taken on August 2, 2021 by Sheriff Blaine Nickson.
16. Exhibit 2—the map of Little Hamlet—is not drawn to scale. All objections to admissibility based on the scale of this exhibit have been waived.
17. Exhibits 1-5 are pre-admitted. Both parties further stipulate that all pre-admitted exhibits may be used (or referred to) during opening statements and at any point that the record is open.
18. Both parties agree to the accuracy of all of the information contained in Exhibit 6--the confidential files relating to Jay Kuang's witness protection paperwork.
19. Both parties waive all hearsay objections to Exhibits 8-13.