



Gradoni & Associates

CRIMINAL DEFENSE INVESTIGATIONS...

FAILURE TO STOP AND RENDER AID NO BILL

Stanley Schneider represented a businessman who encountered three teenage girls at an intersection. As the man inched through the intersection, the girls started yelling at him and placed their hands on the fender of his vehicle. The defendant was later arrested when one of the girls told police that he ran into her and left the scene. Investigators interviewed the three teenage females, finding discrepancies in their stories. Preservation of the vehicle showed the teenagers' handprints on the side of the vehicle rather than the front of the vehicle as they claimed. A package was presented to the Grand Jury and the defendant was No Billed.

MRP DISMISSAL

JoAnne Musick represented the defendant whose felony probation was revoked due to the fact that the defendant had allegedly exposed himself to a topless dancer. Investigators established the topless dancer's poor credibility through a background investigation and an interview with her. The interview established that the complainant would make a poor witness for the state.

BURGLARY ACQUITTAL

Staci Biggar represented a defendant charged with burglary when the homeowner found an intruder in his apartment. The state's case hinged on the complainant's identification from the photo spread. Investigators interviewed the complaining witness and learned it took over five minutes for him to identify the defendant and he was less than positive on his identification. Staci was able to utilize the information during trial to secure an acquittal.

ROBBERY DISMISSAL

Perry Bass represented an individual charged with robbery of a female in the parking lot of a grocery store. Our investigation determined that the defendant won \$200 from the complainant in a shell game. Investigators determined that the two witnesses provided by the complainant did not exist. Interviews with the complainant's family members found them willing to swear she had made up the story. Perry used this information to obtain a dismissal.

AGGRAVATED ASSAULT ACQUITTAL

Jill Wallace represented a defendant charged with aggravated assault because his girlfriend complained he had threatened to kill her by stabbing her with a knife. Investigators interviewed the complainant, who admitted that she lied to police about the assault. The complainant also stated the witness to the assault did not actually see the incident.

PROBATION IN MURDER TRIAL

Troy McKinney represented a defendant charged with murder as a driver of a vehicle involved in a road rage shooting on the freeway. We relentlessly pursued each of the State's Witnesses and the accuracy of their identification. We established that the defendant's car did not really fit the description of the suspect vehicle. The defendant was convicted after 14 hours of jury deliberations. During the punishment phase, the defendant was given probation in a short period of time. Troy felt that the probation decision was largely due to the number of questions raised about the defendant's identification during the trial stage.

AGGRAVATED SEXUAL ASSAULT OF A CHILD ACQUITTAL

George Parnham represented a 17-year-old male who was charged with sexually assaulting a 14-year-old boy. During trial, Parnham was able to utilize the information we developed during our investigation that the complaining witness had numerous conduct problems at school and was known as a liar. The victim's mother testified that the incident never happened. We also established that the defendant's family had caught the complainant stealing and had banned him from their property.

ASSAULT TO DO BODILY INJURY ACQUITTAL

Stephanie Martin represented a defendant who was charged with kicking and beating his girlfriend in front of his residence. Investigators were able to identify a number of discrepancies in the complainant's story. Investigators were also able to dilute the only eyewitness account of the incident. The crowning touch was finding the complainant's ex-husband, who testified that the complainant had tried to retaliate against him in the past by filing false criminal charges.

SENTENCE REVERSAL

Stanley Schneider represented a defendant charged with gay bashing. The defendant pleaded guilty, asking the court to set punishment. The complainant wanted the most severe penalty the law could provide. The defendant was given a 20 year sentence. Investigators learned that the complainant was living with one of the other co-defendants. The complainant told Investigators that he was high on methamphetamines the night of the incident and he now wanted the second co-defendant's case to be dismissed. The judge sentenced the second defendant to probation, giving the same sentence to our defendant, who had been previously incarcerated.

ASSAULT PUBLIC SERVANT ACQUITTAL

Danny Easterling represented a Harris County inmate who was charged with assaulting a deputy while in custody at the jail. Investigators interviewed six inmate witnesses to the incident. Easterling was able to utilize the eye witness testimony to obtain an acquittal for his client.

CAPITAL MURDER HUNG JURY

Skip Cornelius represented a defendant who was charged with causing a fire that resulted in his brother's death. The defendant had previously been sent to prison for murder, having burned the victim to death. Investigators interviewed a number of family members who were able to cast doubt on a motive for the murder, also providing a potential suspect other than the defendant.

VICTORIA IMMIGRANT DEATH CASE ACQUITTAL

Robert Scardino and Ali Fazel represented a female charged as a co-conspirator with the ring's leader in facilitating the smuggling of illegals on the tractor trailer in Victoria. Investigators traveled to the Valley and investigated the defendant's relationship with the ring leader and learned it was not what had been presented by the Government. There has been no compensation traded between the defendant and ring leader. The female was the only defendant out of four acquitted.

"We are **dedicated** to producing **factual AND accurate, unbiased documentation for clients in a timely manner.** The **integrity AND confidentiality** of our work is **top priority!**"

MURDER ACQUITTAL

Randy Schaffer represented a young Hispanic male who had been convicted of a drive-by shooting, resulting in a life sentence. After Randy got the case overturned on appeal, we assisted in the new trial preparation. The State's case was built mostly on eyewitness testimony. The eyewitnesses testified to having actual observation of the shooting while in a moving car. Investigators filmed a re-creation of the eyewitness' account of the events that occurred in front of the club where the incident started and the driving scenes described by the witnesses. The videotapes proved that the witnesses could not have made an identification of the suspect. The videotapes, along with Randy's skillful cross-examination of the witnesses, resulted in an acquittal, freeing the young man from prison.

CAPITAL MURDER HUNG JURY

Katherine Scardino and Jimmy Philips, Jr. obtained a hung jury in a high profile capital murder case in the 184th Criminal District Court, charging the defendant and his cousin with capital murder in the shooting deaths of two employees at the Hollywood Video store. Our investigators had interviewed a number of fact witnesses who had different opinions on the identity of the actual shooter. The jury hung due to questions about the defendant's statement to police. The second trial resulted in a guilty conviction for the defendant, but the jury assessed a life sentence mainly due to the efforts of Gina Vitale's mitigation efforts in conjunction with our firm's investigation.

CAPITAL MURDER LIFE SENTENCE

Phoebe Smith and Gordon White represented a defendant charged with the murder of a husband, wife and their child in a dope deal gone bad in a high profile case in Fort Bend County. The co-defendant, who alleged our client was the shooter, had previously been tried and given a life sentence. Our investigation focused on the co-defendant, his background and the forensic evidence that led one to believe the co-defendant may have been the shooter. The jury found the defendant guilty, assessing him a life sentence, rather than the death penalty.

PLEA BARGAIN AGGRAVATED SEXUAL ASSAULT TO A CHILD

George Parnham represented a defendant who was on probation for sexual assault to a child, who was charged with the sexual assault of a second child, placing the defendant in jeopardy of a life sentence. Our investigation determined that the complaining witness had been encouraged by her aunt to make the allegations. Our interview with the complainant revealed that she wanted to recant her testimony. Parnham utilized the information developed during our investigation to avoid a trial and obtain a 10 year sentence for the defendant.

CANTINA CASE PLEA TO LESSER OFFENSES/MISDEMEANORS

Gradoni & Associates represented all five of the Houston Police officers charged in the "cantina" case on behalf of the Houston Police Department Union. Interviews were conducted with a number of cantina owners who were very happy with the security services provided by the indicted officers. A background investigation was conducted on the club owner who

initiated the investigation. It was discovered that his business practices indicated he too was involved in criminal activity. The information we developed to discredit the complaining witness was utilized by **Robert Scardino** and it became the driving force for the State to offer a misdemeanor plea to all five defendants instead of pursuing the first degree felony punishment.

AGGRAVATED ROBBERY/HUNG JURY

Robert Loper represented one of the defendants charged with a number of driveway robberies in both Fort Bend and Harris Counties. The State's case rested solely on the identification of the complaining witness. Investigators were able to determine that the complaining witness told the police two different versions of what occurred and a third version to our investigator. The jury was unable to reach a verdict because the State had never found the defendant with a weapon coupled with Bob's cross examination of the complaining witness, who appeared not too certain of the their identification from the stand.

AGGRAVATED ROBBERY ACQUITTAL

Robert Fickman represented an individual charged with the aggravated robbery of a video store employee in the parking lot of the establishment. The complainant claimed he was buying used videos from the defendant, who robbed him of \$500 at gunpoint. Our investigation identified a number of discrepancies in the complaining witness' statements to police that established that the transaction between the complainant and the defendant was really a dope deal. Rob was able to utilize our investigation at trial to obtain an acquittal for his client.

MEDICAID FRAUD HUNG JURY

Kent Schaffer and Rick Detoto represented a doctor charged with multiple counts of Medicaid fraud related to physical therapy sessions and wheelchair prescriptions. Investigators interviewed a number of the doctor's patients, making arrangements to transport them to court in order that they may testify about their needs for a wheelchair. Investigators also videotaped FBI agents wheeling government witnesses into the courthouse in wheelchairs prior to those witnesses testifying that they did not need one. Kent's skillful cross-examination of the government witnesses, who had entered into plea bargain agreements, greatly affected their credibility.

BURGLARY OF A HABITATION NO BILLED

Michael Stone represented a young male charged with burglary of a habitation because the complainant's neighbor allegedly saw the defendant go through an open window. Investigators interviewed the neighbor who stated that she never saw the defendant go into the residence, only seeing him bent over a bush in front of the house. The witness maintained she never saw the defendant enter the house, as was described in the police report. Interviews with other witnesses who saw the defendant verified that they never saw him enter the house either or leave the area with anything in his hands. A package was prepared for the Grand Jury who returned a No Bill.