



Photo 1 from Medical Examiner's Office on December 31, 2009 (Exhibit A)

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Photo 2 from Medical Examiner's Office on December 31, 2009 (Exhibit B)

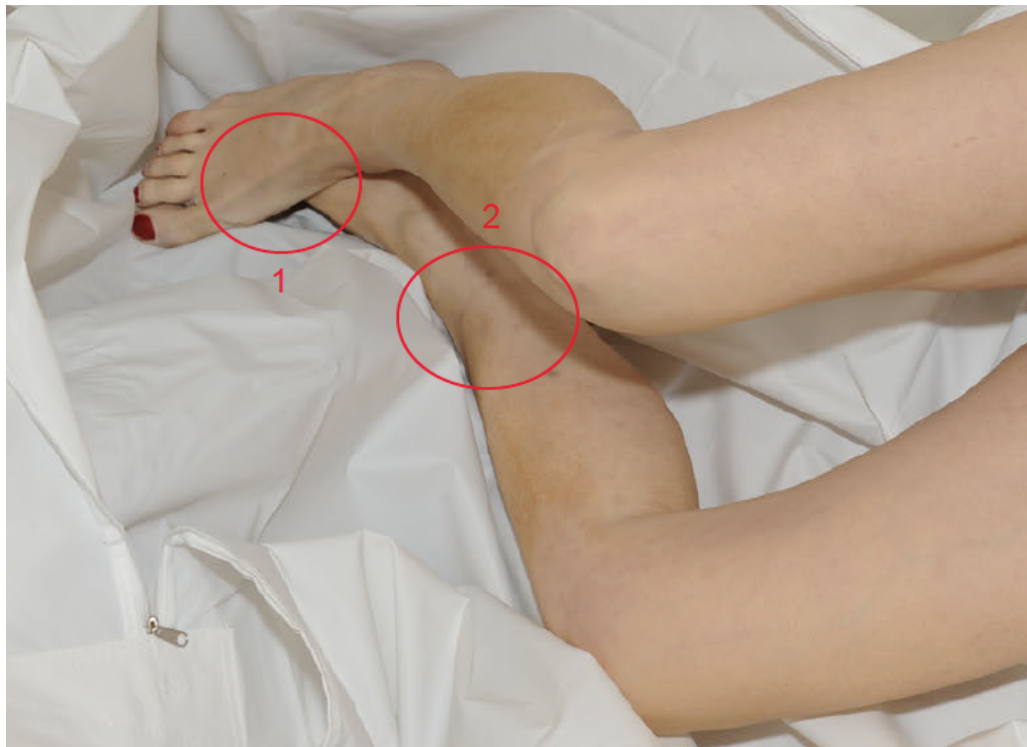


Photo 1 taken in Shele's bathroom on December 31, 2009 (Exhibit C)



Photo 2 taken in Shele's bathroom on December 31, 2009 (Exhibit D)

In fact, to remove any doubt, there was another photograph of Shele's legs that was clearly taken at OCME, and which does not show blood spatter on the soles of her feet and on the white ankle tags that *was* clearly visible in the other OCME photographs:

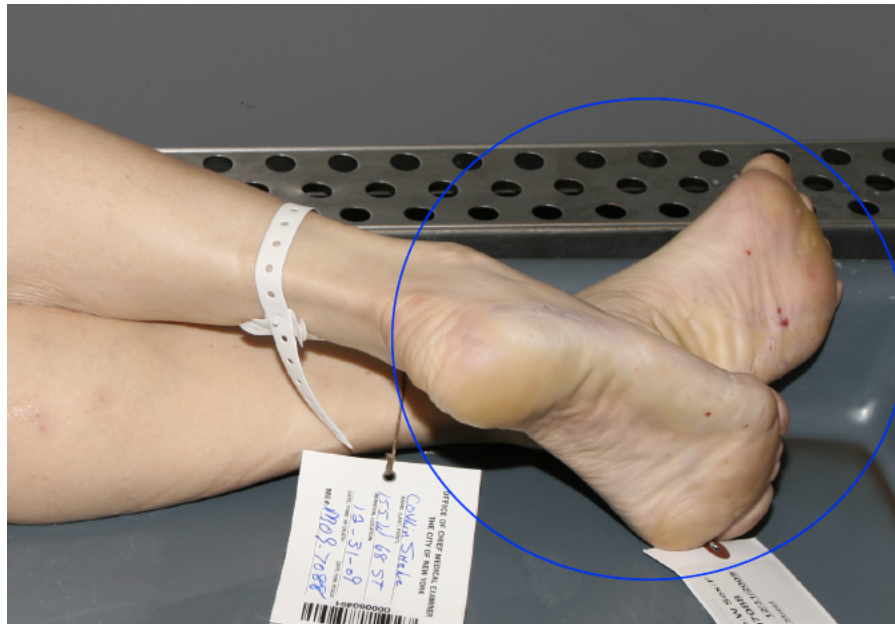
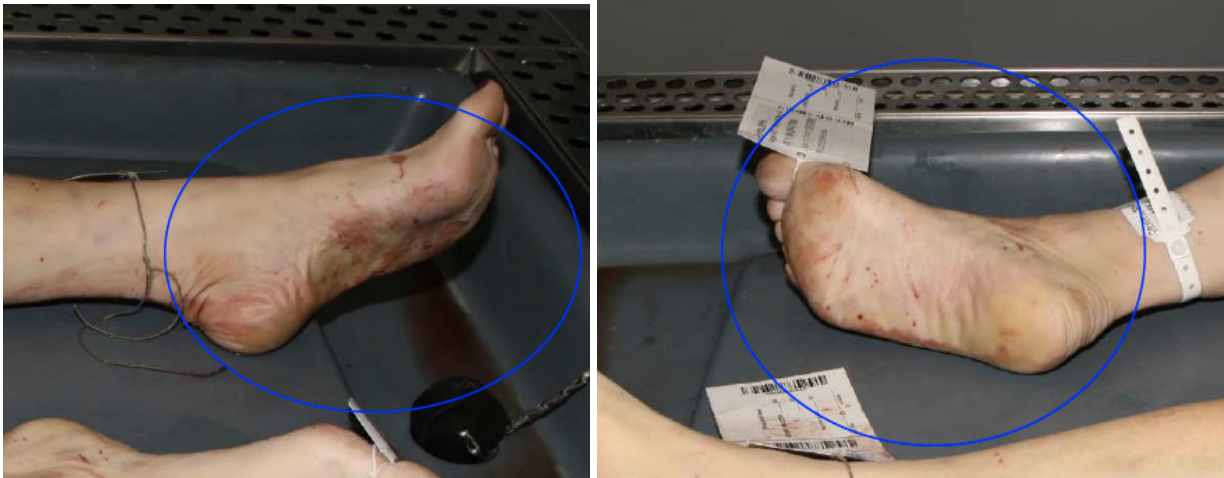


Photo 3 from Medical Examiner's Office on December 31, 2009 (Exhibit E)



Excerpts of Exs. A and B

This third OCME photograph (Ex. E), which was just as available to the prosecution at trial as any other shown here, unambiguously proves that the blood spatter the People held up as proof that Mr. Covlin brutally attacked Shele and later moved her to the bathroom plainly was not present when she arrived at OCME, and therefore could not have been caused at her apartment.

The People dismiss the discrepancy that Mr. Covlin has highlighted by pointing out that the images show different parts of Shele's legs. In doing this, the People provide yet another example of a frankly audacious disregard of their duty of candor to the tribunal—in this instance, one that is readily disprovable with only a cursory review of the images. The truth was readily discernible to anyone who bothered to look at the photos, as the blood spatter was even on the ankle body tags that were placed on Ms. Covlin's body at OCME but obviously these ankle body tags were not on her body in the bathroom. (See Mot., Exhibits B, G-H).

That the People were willing to mislead the jury so blatantly in the first instance with the blood spatter photos is distressing enough. That they now paper over that misconduct with so