

# **DISCONNECT & DEFEAT THE CHEMICAL TEST**

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HUDSON, WISCONSIN**



# Types of Defenses in OWI Cases

 Client not the driver

 Involuntary

 Impaired After Driving

 Blood/Breath Test – Scientific Defense

Blood/Breath Test – Disconnect Defense

 Not Impaired, No Test, Refusal/Suppression



# ALL YOU REALLY NEED TO KNOW

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**ONE OF THESE THINGS IS NOT LIKE THE OTHERS.**



# USING THE SESAME STREET DEFENSE.

“Show me.”



His driving was fine. He passed the fields.

So the (breath) (blood) test has to be wrong. The test result is all they have, so the test is 100% what this case comes down to.

The machine, the prosecution's push-button justice, and the question of whether we're going to have trial by jury or whether we're going to have a trial by (Intoximeter) (chromatograph).

You're not just here to be a rubber stamp for the (Intoximeter) (chromatograph). Your job is more important than that. You're here to look at all of the evidence. The sober driving, sober behavior, sober field sobriety tests. Because that (breath) (blood) test number sticks out like a sore thumb, kinda like that Sesame Street song "one of these things is not like the other, one of these things doesn't belong."

Because that number is not like the other parts of this case. One of these things is not like the other. One of these things doesn't belong. The test result has to be wrong.

# FUNDAMENTALS OF THE DISCONNECT DEFENSE



0.24!!

PULLED OVER  
FOR EQUIPMENT  
VIOLATION

NO SLURRED  
SPEECH

STUCK THE  
LANDING ON SFST



(high number = good?)

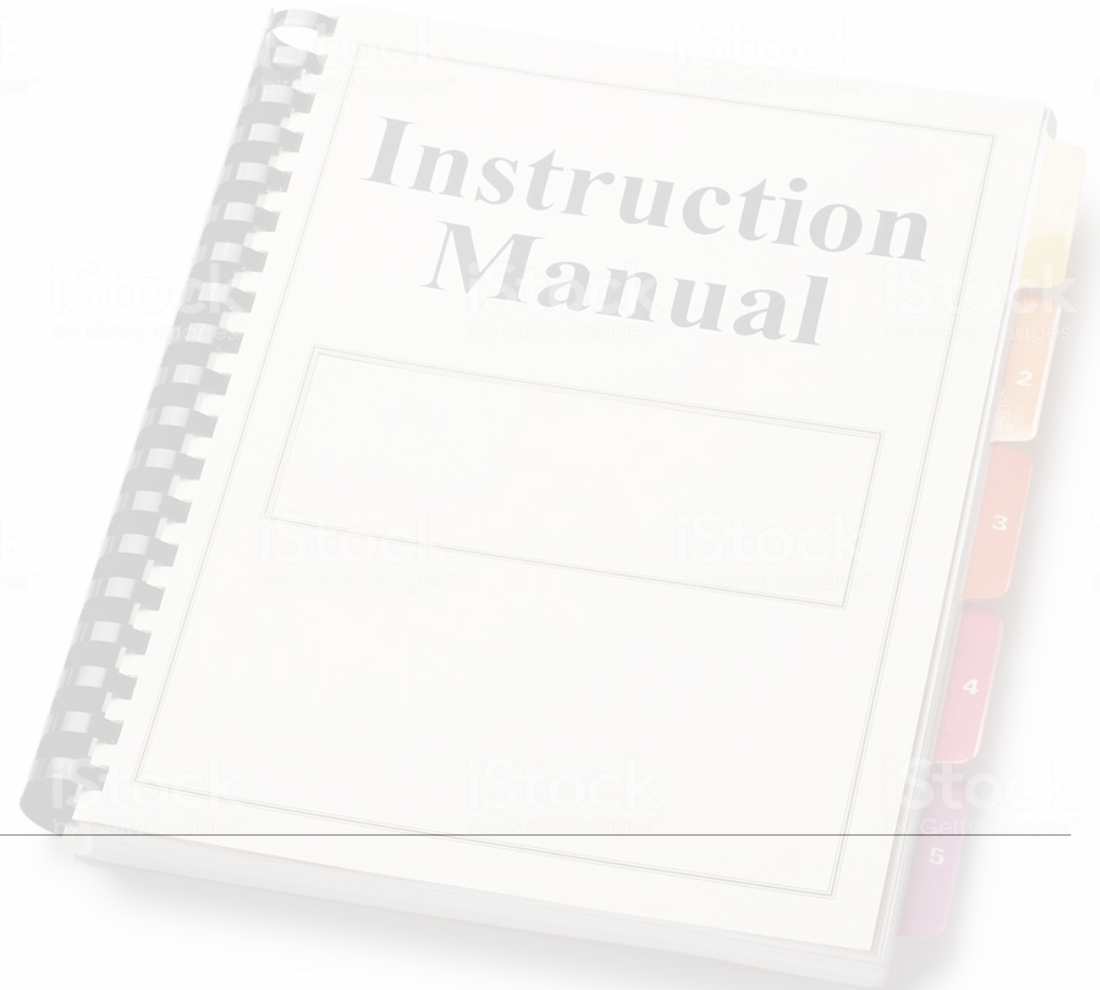
# Tools for the Job

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- Your favorite NHTSA Manual.
- If a blood draw, we want chromatography for the whole run.
- Breath Machine Manual (Intoximeter EC/IR II). Manufacturer Info & LEO Training.
- Expert witness prior transcripts, whether blood or breath.
- CV and job description to compare/contrast.



R.F.M.  
(and save the link below)



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[HTTPS://WWW.WSP.WA.GOV/BREATHTEST/DREDOCS.PHP](https://www.wsp.wa.gov/breathtest/dredocs.php)



# NOT GUILTY INGREDIENTS

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MINIMAL/EXPLAINABLE BAD DRIVING



DECENT/EXPLAINABLE PERFORMANCE ON SFST



SENSE OF UNFAIRNESS/OUTRAGE



EMOTIONALLY POTENT OVERSIMPLIFICATION RE: TEST



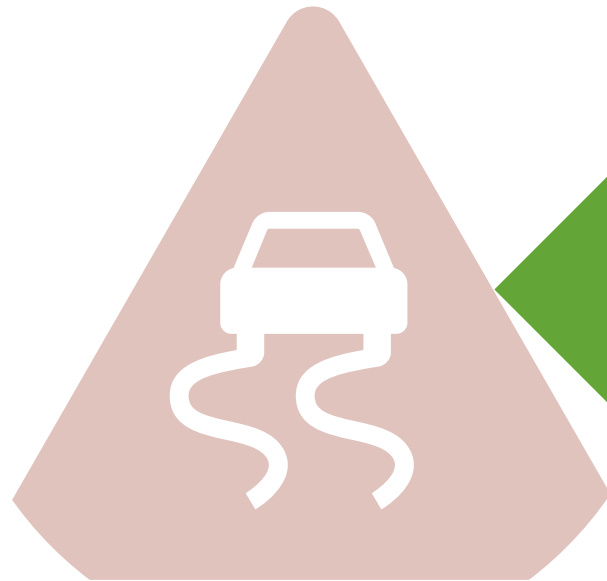
PROPOSE YOUR OWN BAC BASED ON EVIDENCE





# NOT GUILTY INGREDIENTS

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MINIMAL/EXPLAINABLE  
BAD DRIVING



# NOT GUILTY INGREDIENTS

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“Weaving within her lane”? More like driving inside her lane. Vehicles don’t run on rails. We’re always making slight momentary corrections. This description of driving *within her lane* is evidence of sobriety, not evidence of impairment. Don’t know what planet the CW was living on, but we can’t go back in time and see the world through his eyes to see how badly he was exaggerating. What we can do is go back in time and see the world through the LEO’s dash cam, and that shows that Avery was driving like a sober person over an extended period of time.



# NOT GUILTY INGREDIENTS

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MINIMAL/EXPLAINABLE BAD DRIVING



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PROPOSE YOUR OWN BAC BASED ON EVIDENCE



# NOT GUILTY INGREDIENTS

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DECENT/EXPLAINABLE  
PERFORMANCE ON  
SFST



# THE GENERAL APPROACH TO SFST EVIDENCE

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HERE'S ONE EASY  
REASON TO JUST  
IGNORE THE HGN.

CLIENT LOOKED  
SOBER ON WAT.

CLIENT LOOKED  
SOBER ON OLS.



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# CASE STUDY #1

0.13 Breath Test  
HGN

## HGN

I first asked Travis to perform Horizontal Gaze Nystagmus. I explained HGN to Travis and he stated that he understood the instructions.

I observed the following clues of impairment during HGN.

1. Lack of Smooth Pursuit - Left Eye.
2. Lack of Smooth Pursuit - Right Eye.
3. Distinct Jerkiness at Maximum Deviation - Left Eye.
4. Distinct Jerkiness at Maximum Deviation - Right Eye.
5. Jerkiness Onset Prior to 45 Degrees - Left Eye.
6. Jerkiness Onset Prior to 45 Degrees - Right Eye.

I observed a total of 6 out of 6 clues during HGN. It should be noted that Travis was informed to not follow the tip of my finger by turning his head two times.



# NHTSA SFST Manual VIII-3:

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Optokinetic Nystagmus occurs when the eyes fixate on an object that suddenly moves out of sight, or when the eyes watch sharply contrasting moving images.

Examples of optokinetic nystagmus include **watching strobe lights**, rotating lights, or rapidly moving traffic in close proximity. The HGN will not be influenced by optokinetic nystagmus when administered properly.

## CASE STUDY #1

0.13 Breath Test  
HGN



**CHAPTER TITLE:**

**"THE OFFICER WAS MISTAKING OPTOKINETIC NYSTAGMUS FOR HORIZONTAL GAZE NYSTAGMUS."**

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**CASE STUDY #1**  
**0.13 Breath Test**  
**HGN**

Q. I'll play another brief portion and I would like you to pay particular attention to the roadside to the right of your two bodies.

A. Okay.

Q. (Playing video.) The sign is reflecting your red and blue emergency lights?

A. Correct.

Q. According to your NHTSA training there are causes of nystagmus, or the involuntary jerking of the eyes, apart from alcohol?

A. Correct.

Q. There are medical causes of nystagmus?

A. Correct.

Q. And those aren't alcohol-related?

A. That's correct.





**CHAPTER TITLE:**

**"THE OFFICER WAS MISTAKING OPTOKINETIC NYSTAGMUS FOR HORIZONTAL GAZE NYSTAGMUS."**

---

**CASE STUDY #1**  
**0.13 Breath Test**  
**HGN**

Q. This is the same manual that we are talking about before.

A. Right.

Q. On section 8, page three, it talks to you about optokinetic nystagmus.

A. Right.

Q. Which occurs when eyes fixate on an object that suddenly moves out of sight or when the eyes watch sharply contrasting moving images?

A. That's correct.

Q. And on the next page it says "Examples of optokinetic nystagmus include watching strobe lights, rotating lights or rapidly moving traffic in close proximity." Did I read that correctly?

A. Yes, you did.

Q. You also agree that we observe some flashing lights reflecting off of that road sign?

A. I would.

**Q. Showing you section 8, page 19 of that manual, "If any one of the standardized field sobriety tests elements is changed, the validity is compromised." Did I read that correctly?**

A. Yes, you did.



# THE GENERAL APPROACH TO SFST EVIDENCE

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HERE'S ONE EASY  
REASON TO JUST  
IGNORE THE HGN.

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# THE GENERAL APPROACH TO SFST EVIDENCE

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# NOT GUILTY INGREDIENTS

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We don't need expert training to decide whether we're looking at a drunk person walk 9 steps up and 9 steps back down a line. We don't need expert training to decide whether we're looking at a drunk person trying to stand on one leg. Folks, you are more than able to answer the only question that matters: *Is what we saw up on that screen more consistent with someone who's almost double the legal limit? Or someone who's well under it?* The answer to that question is clear.





YA CAN'T WIN  
'EM ALL ...





YA CAN'T WIN  
'EM ALL ...



21:23:

# DO OWN THE SQUAD/BODY CAMERA VIDEO.

THAT IS YOUR EVIDENCE.



# OWNING THE BODY/SQUAD VIDEO

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THERE IS VIDEO OF  
HIS SFST  
PERFORMANCE.



THE GOVERNMENT  
TURNED IT OVER  
TO US.



I PROMISE THAT IF  
THEY DON'T SHOW  
IT TO YOU TODAY,  
THEN I WILL.

BECAUSE IT DOESN'T HELP THE GOVERNMENT.  
IT HELPS US. THAT'S NOT THEIR VIDEO. IT'S OURS.





# WHAT ARE SFSTs, EVEN ACCORDING TO THEM?

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“YOUR FIRST TASK IN PHASE THREE IS TO ADMINISTER THREE SCIENTIFICALLY VALIDATED PSYCHOPHYSICAL (FIELD) SOBRIETY TESTS. BASED ON THESE TESTS AND ON ALL OTHER EVIDENCE . . . YOU MUST DECIDE WHETHER THERE IS SUFFICIENT PROBABLE CAUSE TO ARREST THE DRIVER FOR DWI.”



DO DEVELOP  
POSITIVE EVIDENCE  
OF SOBRIETY.

---

SCORE THE POINTS



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## Task one: initial observations

### (1) Problems maintaining proper lane position – 7 cues

- Weaving
- Weaving across lane line
- Drifting
- Straddling a lane line
- Swerving
- Almost striking object or vehicle
- Turning with a wide radius



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## Task one: initial observations

### (2) Speed and breaking problems – 4 cues

- Stopping problems
- Unnecessary acceleration or deceleration
- Varying speed
- 10 mph or more under the speed limit

**WHAT'S MISSING!?**



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## Task one: initial observations

### (3) Vigilance problems – 6 cues

- Driving without headlights at night
- Failure to signal
- Driving wrong way
- Slow response to traffic signals
- Slow response to officer's signals
- Stopping in land for no apparent reason



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## Task one: initial observations

### (4) Judgment problems – 7 cues

- Following too closely
- Improper lane change
- Improper turn
- Driving on other than designated roadway
- Stopping inappropriately in response to officer
- Inappropriate or unusual behavior (eg throwing a beer can out the window)
- Appearing to be impaired



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## Task two: Observation of stop

### Stopping sequence - 6 cues

- Tries to flee
- No/slow response
- Abrupt weave
- Sudden stop
- Strikes curb
- New violations



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## Phase one: vehicle in motion – post stop

### Post stop cues

- Difficulty with motor vehicle controls
- Fumbling with driver license or registration
- Difficult exiting the vehicle
- Repeating questions or comments
- Swaying, unsteady, or balance problems



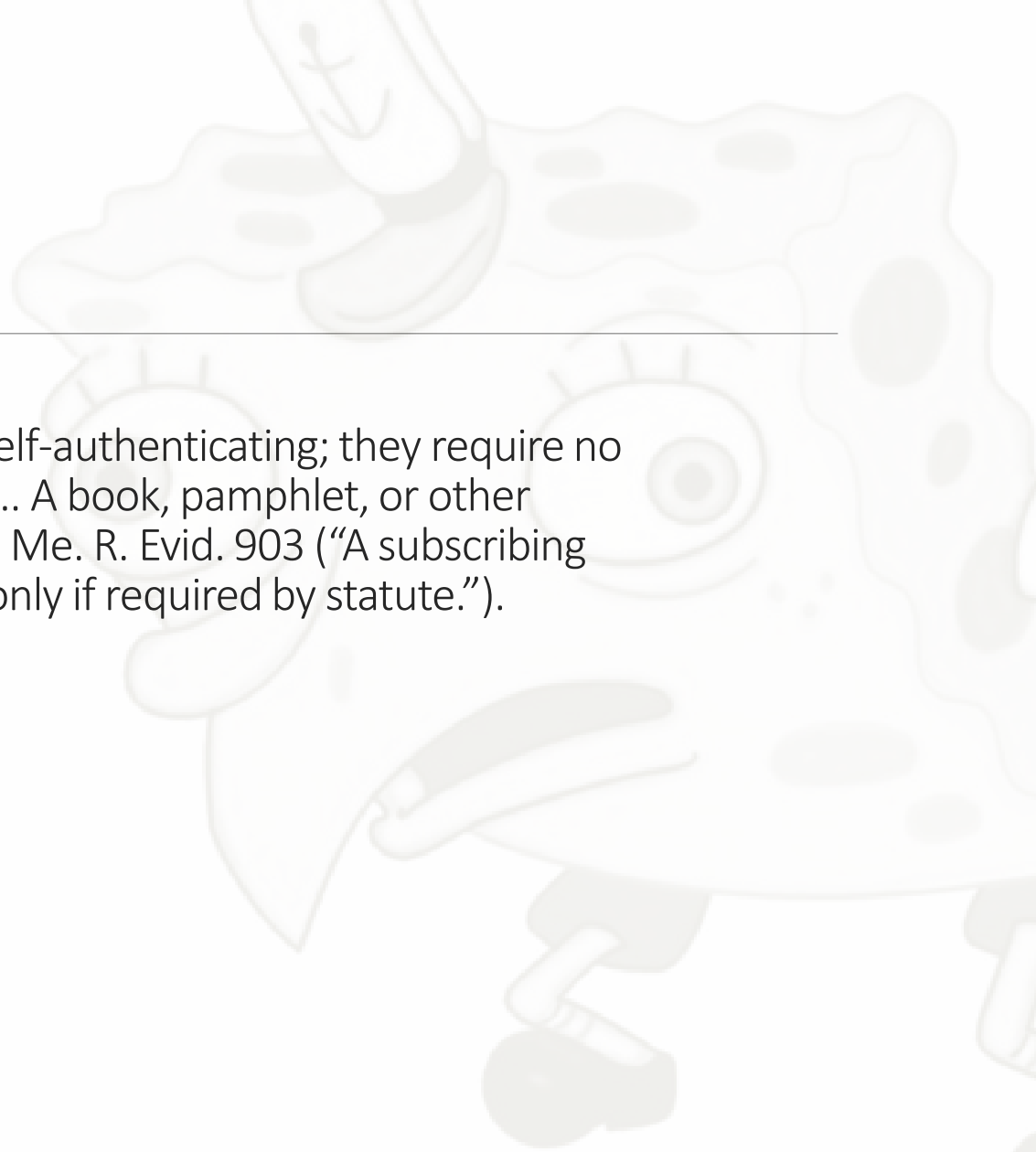




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“ThAt’S nOt My  
VeRslON oF tHe  
MaNuAl.”





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- Me. R. Evid. 902(5) (“The following items of evidence are self-authenticating; they require no extrinsic evidence of authenticity in order to be admitted. ... A book, pamphlet, or other publication purporting to be issued by a public authority.”); Me. R. Evid. 903 (“A subscribing witness’s testimony is necessary to authenticate a writing only if required by statute.”).
  - Subpoena
  - ORR/FOAA



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# CASE STUDY #1

## 0.13 Breath Test WALK AND TURN

### WALK AND TURN

The next test I asked Travis to perform was Walk and Turn. I explained and demonstrated the test to Travis. Travis stated that he understood the instructions and did not have any questions.

I observed the following clues of impairment during Walk and Turn.

1. Starts Too Soon.
2. Stops Walking.
3. Misses Heel-Toe.
4. Steps Off Line.
5. Actual Number of Steps Taken.
6. Improper Turn.

I observed a total of 6 out of 8 clues during Walk and Turn. During the test, Travis started the test before I instructed him to do so. Travis missed heel-toe on multiple occasions on his first 22 steps and on his 11 return



CHAPTER 1

"I  
CO  
BE

CASE STUDY #1  
0.13 Breath Test  
WALK & TURN





# CASE STUDY #1

0.13 Breath Test  
**ONE LEG STAND**

## ONE LEG STAND

I did not observe any clues of impairment during One Leg Stand.



CHAPTER TITLE:

CASE STUDY #1  
0.13 Breath Test  
ONE LEG STAND

V  
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V  
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C  
A  
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Q  
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Q  
A.  
Q.  
A.



okay" on the



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# CASE STUDY #2

0.12 Breath Test  
HGN

## Field Sobriety Testing

**HGN-** All front flashing lights on my cruiser and Deputy Bader's squad car were turned off and no reflection was present. I observed all six clues during the test. I observed lack of smooth pursuit in Moe's left and right eyes. I observed distinct and sustained nystagmus at maximum deviation in Moe's left and right eyes. I observed onset of nystagmus prior to 45 degrees in Moe's left and right eyes.



*CHAPTER TITLE:*

*"THE OFFICER FAILED TO RULE OUT NON-ALCOHOL-RELATED CAUSES FOR NYSTAGMUS, SO THE VALIDITY OF THE TEST WAS COMPROMISED, JUST LIKE THE OFFICER'S MORALS."*

---

CASE STUDY #2  
0.13 Breath Test  
HGN

Q You were trained that if any one of the standardized field sobriety tests elements is changed, the validity is compromised.

A Yes.

Q That first word standardized – means same way every time?

A Yes.

Q So, you testified about the things you did in the horizontal gaze nystagmus test?

A Yes.

Q You used a stimulus?

A My finger's the stimulus that I used, yes.

Q And the stimulus you chose was your finger, right?

A Yes.

Q And you put it 12 inches or so – 12 to 15 inches away from his face?

A 12 to 15 inches, yes.

Q And then you began to look for the six standardized clues?

A Yes.

Q Isn't it true that there's some things you're supposed to look for prior to beginning to look for standardized clues on the horizontal gaze nystagmus test?





*CHAPTER TITLE:*

*"THE OFFICER FAILED TO RULE OUT NON-ALCOHOL-RELATED CAUSES FOR NYSTAGMUS, SO THE VALIDITY OF THE TEST WAS COMPROMISED, JUST LIKE THE OFFICER'S MORALS."*

---

CASE STUDY #2  
0.13 Breath Test  
HGN

A Yes.

Q Supposed to look for equal tracking?

A Yes.

Q Supposed to look for equal pupil size?

A Yes.

Q Prior to beginning to look for clues?

A Yes.

Q And those are things designed to make sure someone is a good candidate for that test in the first place?

A Yes.

Q You didn't testify on direct examination about any of those pre-checks?

A I wasn't asked.

Q You did not testify in direct examination about any of those pre-checks?

A I wasn't asked.

Q (Pregnant pause.)

A No, I didn't.



*CHAPTER TITLE:*

*"THE OFFICER FAILED TO RULE OUT NON-ALCOHOL-RELATED CAUSES FOR NYSTAGMUS, SO THE VALIDITY OF THE TEST WAS COMPROMISED, JUST LIKE THE OFFICER'S MORALS."*

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CASE STUDY #2  
0.13 Breath Test  
HGN

Q Well, let's just take it from the beginning then. So, you looked for equal tracking?

A I looked for equal pupil size first and then equal tracking.

Q And then you begin to look for the six standardized clues?

A Yes.

Q So, those are **the things** you look for prior to beginning to look for the six standardized clues, even though you didn't testify about that?

A Yes.

Q Trooper, I'm showing you a bound manual entitled "DWI Detection and Standardized Field Sobriety Testing", right?

A Yes.

Q And that as the NHTSA logo on the bottom?

A Yes.

Q You're familiar with that organization?

A Yes.

Q National Highway Traffic Safety Administration?

A Yes.



**CHAPTER TITLE:**

**"THE OFFICER FAILED TO RULE OUT NON-ALCOHOL-RELATED CAUSES FOR NYSTAGMUS, SO THE VALIDITY OF THE TEST WAS COMPROMISED, JUST LIKE THE OFFICER'S MORALS."**

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**CASE STUDY #2**  
**0.13 Breath Test**  
**HGN**

Q All right. And then in the top, it has The U.S. Department of Transportation logo as well?

A Yes.

Q There's a section on HGN?

A Correct.

Q Then section 8, page 7 says, "Administrative procedures for the HGN", right?

A Yes.

Q And there's the equal pupil size and tracking that we talked about, right?

A Yes.

Q Under 4, it also requires that you look for resting nystagmus prior to beginning to look for clues, right?

A Yes.

Q You testified that the things you look for were equal pupil size and equal tracking, right?

A Correct.

Q And you said those were the things you look for prior to beginning to look for clues?

A Yes.

Q You never testified that you looked for resting nystagmus; did you?

A I wasn't asked.

Q You didn't say anything about resting nystagmus?

A No.

Q But you did testify that if a single element of the field sobriety test is changed, that the validity is compromised?

A Yes.

Q Let's talk about the walk and turn test, okay?





# CASE STUDY #2

0.12 Breath Test  
WAT

**Walk and Turn-** I explained and demonstrated the test for Moe and he said he understood. I observed three clues during the test. Moe lost his balance and could not maintain the instructional position. Moe failed to make heel to toe contact on all steps during the test. Moe walked 10 steps on the first and the return portion of steps, not 9 as I explained and demonstrated.



CASE STUDY #2  
0.13 Breath Test  
WAT

CHAPTER #11

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f the

aginary



# CASE STUDY #2

0.12 Breath Test

OLS

**One Leg Stand-** I explained and demonstrated the test for Moe and Moe told me he understood. I observed three clues during the test. Moe raised his right foot and dropped it after approximately 22 seconds. Moe swayed while balancing throughout the entire test. Moe held his arms almost parallel to the ground for balance during the test; I told him multiple times keep your arms at your sides.



**CHAPTER TITLE:**

**"THE OFFICER DID THIS OLS-DIVIDED-ATTENTION TEST IN AN UNSTANDARDIZED, INVALID, AND UNFAIR WAY BY DIVIDING MR. ABC'S ATTENTION MORE THAN HE WAS SUPPOSED TO."**

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**CASE STUDY #2**  
**0.13 Breath Test**  
**WAT**

Q These are standardized tests?

A Yes.

Q They're divided attention tasks?

A Yes.

Q You're supposed to be dividing his attention a standardized amount?

A That's the point of the test, yes.

Q All right. And in specific ways, right?

A Yes.

Q Here it's dividing his attention between a physical task and a mental task?

A Yes, balance and counting.

Q Sure. Balancing and counting, right. But again, nowhere in your training does it say that you're supposed to be giving him instructions while he's performing the test, right?



## CASE STUDY #2

### 0.13 Breath Test

#### WAT

A Depends on if he's performing the test correctly or incorrectly.

Q So, I'm showing you section 8, page 12 of that manual and this is the procedures for one leg stand testing, right?

A Yes.

Q Show me where it says that during the performance of the test, it's the standardized procedure for you to give him additional instructions while he's performing it?

A If you've read it and it's not in there, I'm imagining it's not in there. I don't remember it being in there.

Q Well, we can go through the procedures for the one leg stand if you want, but I could just ask it this way. You would agree that nowhere in your training does it say?

A In the manual, I don't believe it does. I don't remember it being in there anywhere.

Q. [Stares.]

A. No it doesn't.





# NOT GUILTY INGREDIENTS

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MINIMAL/EXPLAINABLE BAD DRIVING



DECENT/EXPLAINABLE PERFORMANCE ON SFST



SENSE OF UNFAIRNESS/OUTRAGE



EMOTIONALLY POTENT OVERSIMPLIFICATION RE: TEST

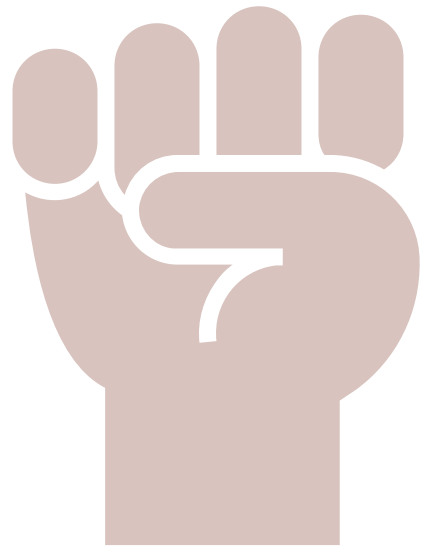


PROPOSE YOUR OWN BAC BASED ON EVIDENCE



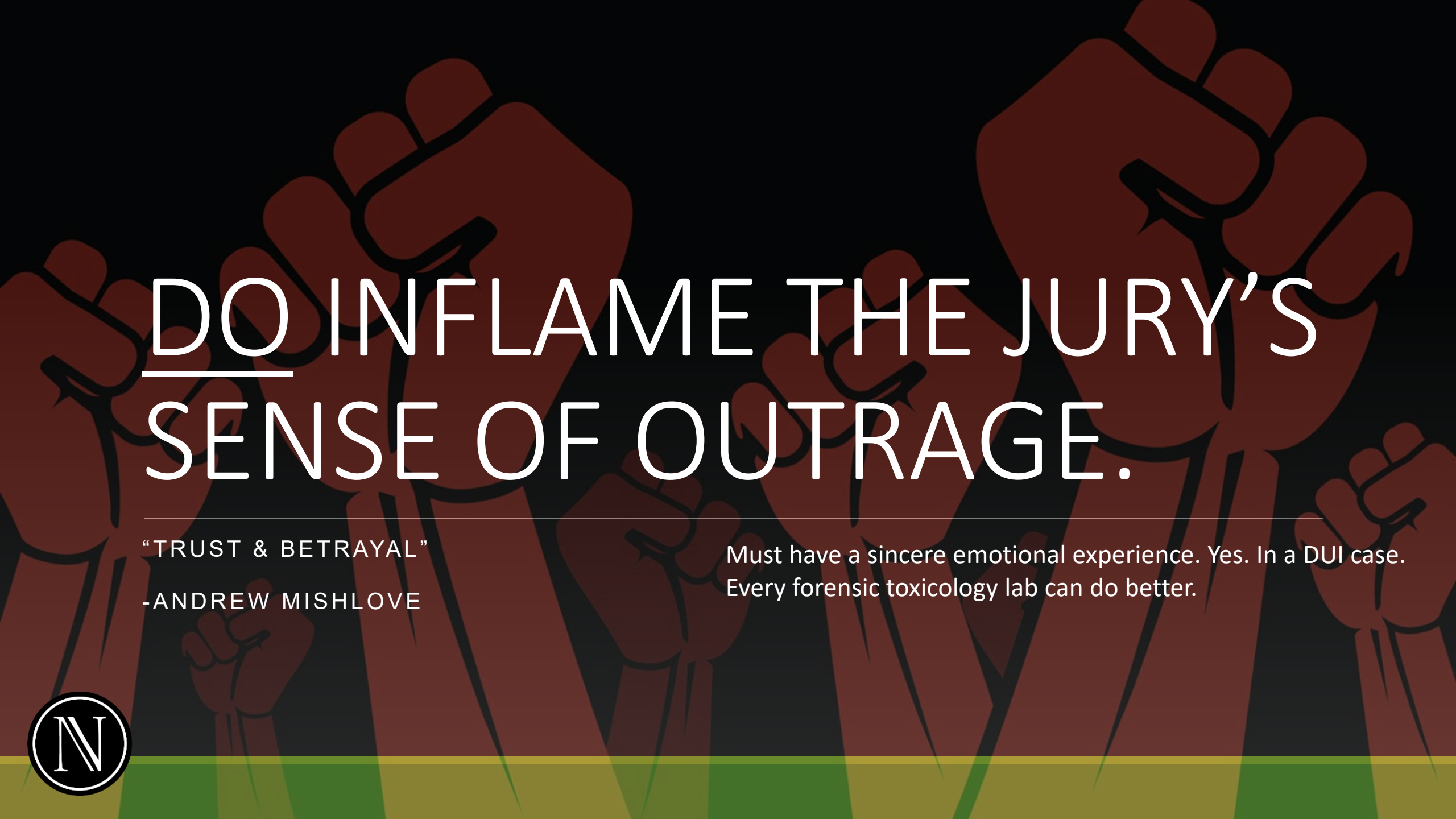
# NOT GUILTY INGREDIENTS

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SENSE OF  
UNFAIRNESS/OUTRAGE





# DO INFLAME THE JURY'S SENSE OF OUTRAGE.

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“TRUST & BETRAYAL”

-ANDREW MISHLOVE

Must have a sincere emotional experience. Yes. In a DUI case.  
Every forensic toxicology lab can do better.





DO BE BOLD AND  
BE YOURSELF.

“THERE ARE FOUR QUALITIES ESSENTIAL TO A GREAT JAZZMAN. THEY ARE TASTE, COURAGE, INDIVIDUALITY, AND IRREVERENCE. THESE ARE THE QUALITIES I WANT TO RETAIN IN MY MUSIC.”

- STAN GETZ



# NOT GUILTY INGREDIENTS

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*Another way they play “gotcha” on these OWI cases, where they’re not quite playing fair, is that the officer said he started counting clues against Mr. X on the WAT before he even said go. Didn’t tell him they would be counting things against him before he said go. But they did it just the same. So he’s stepping off an imaginary line that no one really knows how wide it is. He’s having things counted against him before they even say “go.” It’s not fair. And when I asked the officer how he did on the one-leg stand, he said “Okay.” Okay!? He did PERFECT ladies and gentlemen, zero clues of impairment, nothing indicating intoxication whatsoever. He did “okay.” Give me a break.*



SENSE OF  
UNFAIRNESS/OUTRAGE



# NOT GUILTY INGREDIENTS

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*And so, there's this sense of "gotcha" in this case, where the State is not playing fair, where the police aren't playing fair, where they have these games they are playing to try to get a conviction.*



SENSE OF  
UNFAIRNESS/OUTRAGE



# NOT GUILTY INGREDIENTS

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*On the WAT, the officer claimed he stepped off the line. We didn't see that on the video. It didn't happen. He walked a straight line, plain as day, but the officer counted that against him. Recall my questions of the officer earlier today. How wide was the line? Well it was an imaginary line, which NHTSA allows me to use. Okay, well how wide was the line? Well it was imaginary. Did you tell him how wide the line was? And if not, how the heck can you say he stepped off of it? It's not fair. We as a society place a massive amount of trust in our police officers, and this is a perfect example of them betraying that trust by playing games with a person's freedom..*



SENSE OF  
UNFAIRNESS/OUTRAGE



# NOT GUILTY INGREDIENTS

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Slow movements.

Bloodshot eyes. Odor of alcohol. Admission to drinking. (3 or 1?)

No matter what they do ...



SENSE OF  
UNFAIRNESS/OUTRAGE





# NOT GUILTY INGREDIENTS

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MINIMAL/EXPLAINABLE BAD DRIVING



DECENT/EXPLAINABLE PERFORMANCE ON SFST



SENSE OF UNFAIRNESS/OUTRAGE



EMOTIONALLY POTENT OVERSIMPLIFICATION RE: TEST



PROPOSE YOUR OWN BAC BASED ON EVIDENCE



# NOT GUILTY INGREDIENTS

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EMOTIONALLY POTENT  
OVERSIMPLIFICATION RE: TEST



# NOT GUILTY INGREDIENTS

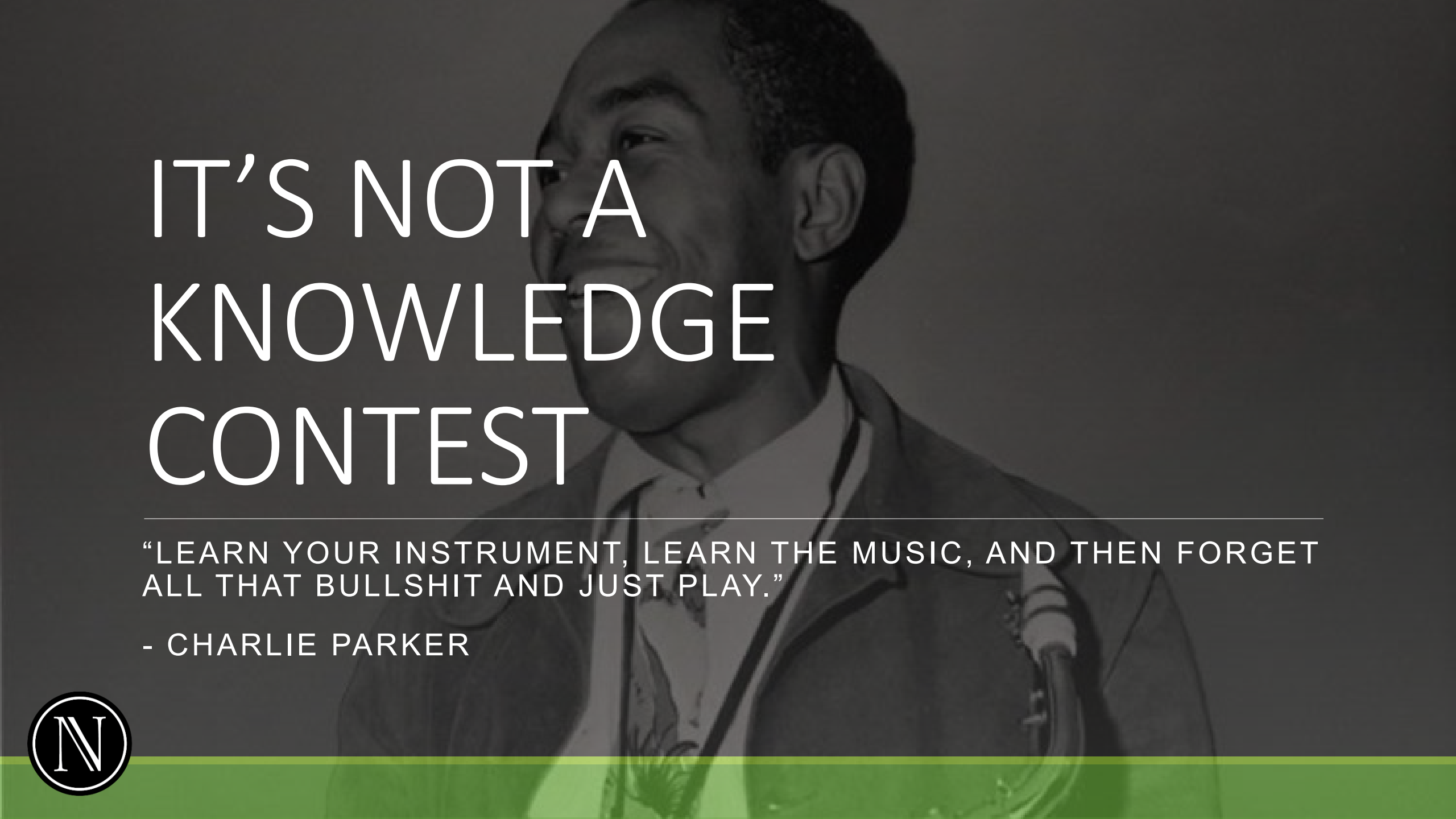
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Something to hang their hat on.  
Already rooting for you.  
Outrage = set 'em up.  
EPO = knock 'em down.  
Same concept for blood & breath. Machines.  
Think airplane, not microwave.  
Think chemotherapy, not aspirin.  
Weave throughout case. Don't wait.



EMOTIONALLY POTENT  
OVERSIMPLIFICATION  
RE: TEST





# IT'S NOT A KNOWLEDGE CONTEST

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“LEARN YOUR INSTRUMENT, LEARN THE MUSIC, AND THEN FORGET  
ALL THAT BULLSHIT AND JUST PLAY.”

- CHARLIE PARKER



# NOT GUILTY INGREDIENTS

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Breath example:

- Blanks, Dry Gas Target, Simulator Solution

Blood example:

- 2010 PT fail, broken “gravimetric” promise, trust and betrayal
- 2010 PT fail, diluter retired two days later, no re-runs.
- Maintenance logs saying “chromatography problems on Alc 3.”
- Calibration outside tolerance, SOP says re-run, no re-runs.



EMOTIONALLY POTENT  
OVERSIMPLIFICATION  
RE: TEST



# NOT GUILTY INGREDIENTS

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MINIMAL/EXPLAINABLE BAD DRIVING



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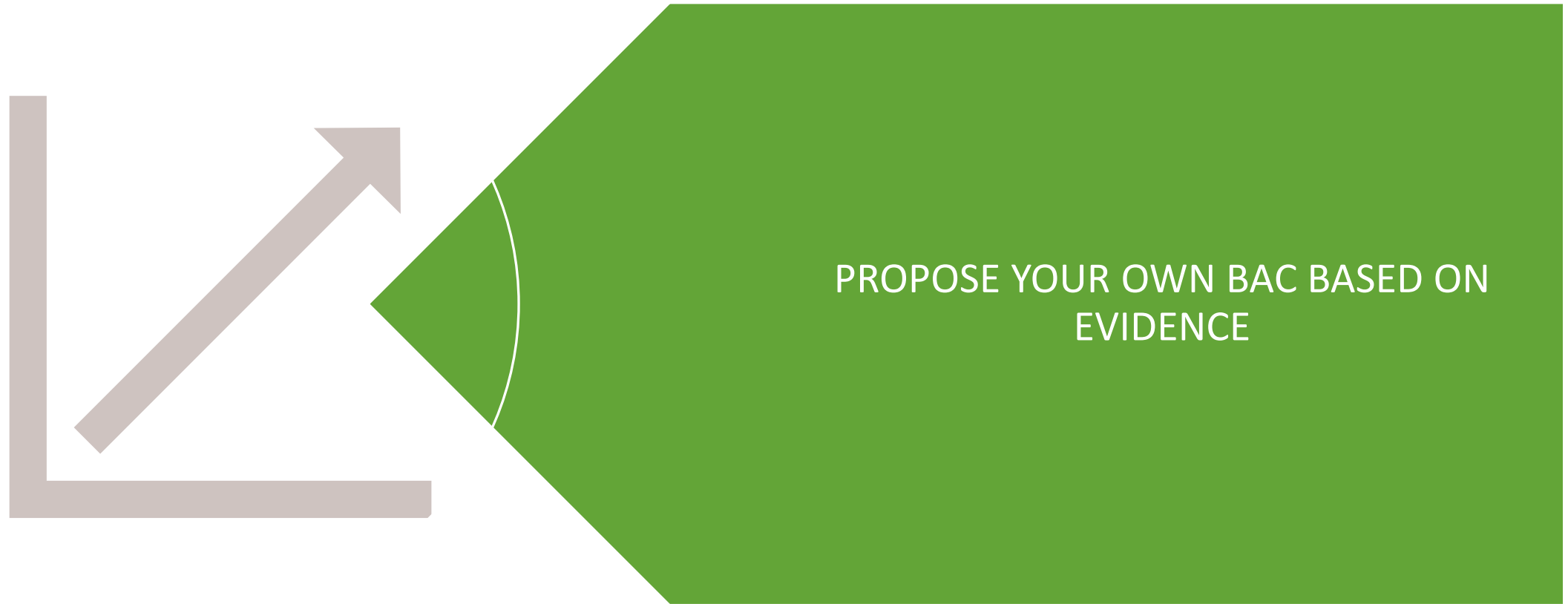


PROPOSE YOUR OWN BAC BASED ON EVIDENCE



# NOT GUILTY INGREDIENTS

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# NOT GUILTY INGREDIENTS

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His statements about having three beers, we heard from the [analyst] that someone who's 6'1" and about 200 pounds that one beer is going to add about 0.02 to his BAC – meaning, he was no higher than 0.06. He said that he had three beers and there's no reason not to believe that. The rest of his statements, all those portions of his statements that the police were able to test, to check, all of those checked out. Mr. XYZ was telling the police the truth about where he was coming from, about what he was doing, and he was telling the truth about how much he had to drink. The truth, that he had 3 beers, was corroborated by the SFST video. The only thing even arguably undermining that, is a number printed on a page, but we know – and certainly the families of the Boeing passengers know - that not every machine that says its clear for take off really is.






GIVE THE JURY THEIR CAPES!



GIVE THE JURY THEIR CAPES!

~~Guarantee~~





GIVE THE JURY THEIR CAPES!

Promise



# THANK YOU!

---

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