

CENTRAL JUDICIAL CIRCUIT
NAVY-MARINE CORPS TRIAL JUDICIARY

UNITED STATES)	
)	SPECIAL COURT MARTIAL
v.)	
)	DEFENSE WITNESS REQUEST
MICHAEL P. NATIVIDAD)	
ADC)	
U.S. NAVY)	1 APRIL 2010
XXX XX 0365)	

The Defense requests the Government produce the following witnesses at trial. This request (including the expected synopses of expected testimony) is subject to modification and update as more discovery is obtained.

a. Fact Witnesses

1. LT Gary C. Ross, USN
Tel # (847) 688-3594

LT Ross initiated the investigation when he received a report of misconduct. LT Ross' testimony is necessary to corroborate or attack the veracity of Leamer and Dorion as well as SA Salter.

2. SA Salter, Jonathon, USN (Located at TSC, Great Lakes)

SA Salter was the first person to make the allegations of misconduct. His testimony is necessary to corroborate or attack the veracity of SA Leamer. He was also allegedly present at the PX incident.

3. SA Bruyere, Alexa, USN (Located at TSC, Great Lakes)

SA Bruyere is a friend of Dorion. Dorion allegedly confided in her about Chief Natividad's misconduct.

4. SA Peterson, Jennifer Lynn, USN (Located at TSC, Great Lakes)

SA Peterson is a percipient witness to Chief Natividad's alleged interest in Seaman Leamer.

5. Barraza, Maurillo A., USN, Ship 11/ B-1, RTC

Barraza received a note from Lowery signed by "Jacky" that expresses disappointment that she did not get to spend much time with ADC Natividad.

6. MA-1 Matias, Mario V., USN BLDG 1313, RTC

MA-1 Matias worked with ADC Natividad and was present when the alleged misconduct occurred.

7. SA Eric Brown, USN (Located at TSC, Great Lakes)

SA Brown is a former recruit within ADC Natividad's division. He was in the office many of the times that Dorion and Leamer were in the office. He will testify that he did not observe any inappropriate conduct and contradicts the allegations made by Dorion and Leamer.

8. SR Gonzalez, Nicole, USN

SR Gonzalez was the female MAA of the division. She was frequently in the office with the Dorion and Leamer and will testify that she did not observe and inappropriate conduct.

9. SA Jansky, Kurt T., USN

SA Jansky was the division education petty officer (EPO). He was also in the office most of the time when the accusers in this case were present and will testify that he did not observe inappropriate conduct.

10. SA Martinez, Aurora G., USN

SA Martinez was also in the office most of the time when the accusers were present. She will testify that she did not observe inappropriate conduct.

11. SA Hernandez Gabriella, USN

She was the medical Yeoman for the division. She was frequently in the office assisting with medical appointments. She will testify that she did not observe any inappropriate conduct.

12. Senior Chief Steve Crisp, USN; RTC; Tel # (847) 688-4949

Senior Chief was ADC Natividad's immediate supervisor. He will testify that he provided regular supervision. He will testify that he did not observe any violations of the training regulations or orders not any inappropriate conduct by ADC Natividad.

b. Character Witnesses

1. AECS Bobby Campbell; VFA- 27 NAF Atsugi, Atsugi Japan; Telephone number Cell: 011819039106078, Work: 01181467634381, email: campsoup31@yahoo.com

AECS Campbell was ADC Natividad's Detachment LCPO when ADC Natividad was stationed at HSL-51 in Atsugi, Japan. AECS Campbell is ADC Natividad's mentor. His advice and counsel were critical in ADC Natividad's promotion to Chief. AECS Campbell will testify as to ADC Natividad's good military character, character for truthfulness and, if sentencing becomes necessary, that he would be serve with him again.

2. AVCM Donna Spaddy; Patextent River, MD. Tel 301-757-8417; Cell 240-561-4360; email Donna.spaddy@navy.mil

AVCM Spaddy has known ADC Natividad since 2006 when they were stationed together in HSL 51. She will testify as to his good military character. She will say he was one of my top Sailors, not a show off and very humble. He is reliable and trustworthy.

3. LT. Kevin Lucas; HSL-40 /training dept. Mayport FL; Telephone number (904) 270-6332;

Email Kevin.lucas@navy.mil.

LT Lucas has know ADC Natividad since 2005. ADC Natividad worked for him from 2005 to 2007. LT Lucas was ADC Natividad detachment Maintenance Officer in HSL 51. He would testify that ADC Natividad is a truthful person and has good military character. He would also work with ADC Natividad again.



Maynam Faraj, Esq.

Certificate of Service

I hereby attest that a copy of the foregoing notice of appearance was served on the court and opposing counsel personally by email on April 1, 2010.



Maynam Faraj, Esq.