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DIRECT EXAMINATION BY MR. HAEG: Q. Were you a trial witness for the state [Tr. 376] against me?

A. [Tony Zellers] Yes.

Q. On or about June 23, 2004, did you, Prosecutor Scot Leaders and Trooper Gibbens have a meeting?

A. Yes, we did.

Q. Did Leaders and Gibbens tape record this meeting?

A. Yes.

Q. Is this -- MR. HAEG: Can I approach and have him look at this, see if it's an accurate transcript of the meeting?

THE COURT: Yeah.

Q. Does this look like an accurate transcription of that meeting? [Tr. 377]

A. This looks like the meeting.

Q. Okay. During this meeting, did Leaders and Gibbens show you an aeronautical map?

A. Yes, they did.

Q. Can I approach and see if you agree that this is a copy of what you were shown?

THE COURT: Sure.

A. This is a copy. The only thing that's slightly different is the green line on it.

Q. Okay.

THE COURT: That's Exhibit 25?

MR. HAEG: Yes, Trial Exhibit 25.

THE COURT: Hang on. Hang on just a second. When -- that thing has, for example, indications where wolves were killed?

THE WITNESS: Yes, Your Honor.

THE COURT: So when they showed you this map, did the map -- was it exactly the way it is there with the wolf kills on there?

THE WITNESS: Yes, it was.

*THE COURT: Okay. But the only thing that was not on there, and correct me if I'm wrong, is the color highlight of some kind of a boundary unit? [Tr. 378]*

*THE WITNESS: Yes.*

*THE COURT: That was not there?*

*THE WITNESS: The boundary unit was drawn on there, but it wasn't highlighted.*

*THE COURT: The highlight wasn't there?*

*THE WITNESS: Right.*

*BY MR. HAEG: Q. Did Prosecutor Leaders and Trooper Gibbens tell you that I had marked the wolf kill locations on this map when they interviewed me during my plea negotiations with them?*

*A. Yes, they did.*

*Q. Did you prove to Prosecutor Leaders and Trooper Gibbens that that map had false hand-drawn game management unit boundaries on it?*

*A. Yes, I did.*

*Q. Did you use the Alaska Department of Fish and Game game management unit's physical description to do this?*

*A. I'm pretty sure I did use the -- the written description of the game management units.*

*Q. Okay. Is this description published in all Alaska hunting regulations?*

*A. Yes, it is. [Tr. 379]*

*Q. Can you point out to --*

*THE COURT: Hang on. Let me just ask a question, make sure I understand what you just said. You were shown this map, and the map had preexisting unit boundary lines marked on it; right?*

*THE WITNESS: Yes.*

*THE COURT: Okay. And you looked at those lines and said that they were in error?*

*THE WITNESS: I looked at the lines and said they were in error. There was a discussion between Trooper Gibbens and myself about he wanted to say the wolf kills were in 19C. I said, no, they were in 19D. And I quoted the boundary line and how this was wrong, to him.*

*THE COURT: So you -- you told him at the time that the boundary lines shown in the map were inaccurately drawn?*

*THE WITNESS: Yes.*

*THE COURT: Okay. Go ahead.*

*BY MR. HAEG: Q. Can you point out to the Court or me what boundary was falsified and where the correct boundaries should have been? [Tr. 380]*

*A. Using the map here, 19C area doesn't have what I'll just call is this toe area that encompasses and circles these wolf kills down here. So 19C's western boundary is where the Babel flows into the Swift. And then everything downstream on the Swift is actually 19D. And upstream is 19C. All the wolf kills were downstream of that point.*

*Q. Okay. Do the false boundaries –*

*THE COURT: So downstream of Swift is 19D, as in David?*

*THE WITNESS: 19D is downstream of where the Babel River flows into the Swift River.*

*MR. HAEG: And the North Fork.*

*THE WITNESS: And the North Fork, yes, of the Swift.*

*THE COURT: Go ahead.*

*Q. Did the false boundaries on that map corruptly make it seem as if the wolves were killed in my game management unit 19C guide area, instead of being killed in game management unit 19D?*

*A. Yes. [Tr. 381]*

*Q. Okay. Did Prosecutor Leaders and Trooper Gibbens and you discuss how I was not allowed to guide in 19D but was allowed to guide in 19C?*

*A. Yes, we had that discussion, so –*

*Q. Okay. Did Prosecutor Leaders, Trooper Gibbens and you discuss how my killing wolves in 19D would not benefit my guide business?*

*A. Yes, we had -- I had the discussion with the trooper that because these were killed outside your guide unit, they were not directly related to your guide, so –*

*Q. Did Prosecutor Leaders, Trooper Gibbens, and you discuss how my killing wolves in 19C would benefit my guide business?*

*A. Yes.*

*Q. Was the wolf control program actually taking place in 19C or 19D?*

*A. As I recall, there was nothing in 19C, but there were parts of 19D that had.*

*Q. Okay. During this meeting, did you point out to Prosecutor Leaders and Trooper Gibbens that their search warrant affidavits also falsified the wolf kill locations to my 19C guide area? [Tr. 382]*

*A. Yes. The affidavits listed the wolf kills in 19C. And I pointed out to them that that was incorrect information.*

*Q. And you may not know this, but did Prosecutor Leaders and Trooper Gibbens tell my jury that I killed the wolves in 19C area to benefit my guide business?*

*A. I can't testify to what, or the reason why they testified that, but Trooper Gibbens did testify under direct from -- from Prosecutor Leaders that the wolves were killed in 19C.*

*Q. Did Prosecutor Leaders and Trooper Gibbens [Tr. 383] use the map upon which I placed the wolf kill locations during plea negotiations against me at trial?*

*A. Yes.*

*Q. Did Prosecutor Leaders and Trooper Gibbens know the map had been falsified to support their case against me when they presented it to my jury as the reason to convict me?*

*A. Yes. [Tr. 384]*