

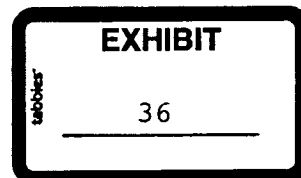
STATE OF WISCONSIN : CIRCUIT COURT : MANITOWOC COUNTY

STATE OF WISCONSIN,)	
)	
Plaintiff,)	
)	Case No. 05-CF-381
v.)	
)	Honorable Judge Angela Sutkiewicz,
STEVEN A. AVERY,)	Judge Presiding
)	
Defendant.)	
)	

AFFIDAVIT OF LAUREN HAWTHORNE

Now comes your affiant, Lauren Hawthorne, and under oath hereby states as follows:

1. I am of legal majority and can truthfully and competently testify to the matters contained herein based upon my personal knowledge. The factual statements herein are true and correct to the best of my knowledge, information, and belief. I am of sound mind and I am not taking any medication nor have I ingested any alcohol that would impair my memory of the facts stated in this affidavit.
2. I have been employed as a law clerk by Kathleen T. Zellner & Associates, P.C., since June 2016.
3. Under the instruction of Kathleen Zellner, I participated in an experiment for the purposes of Steven Avery's Petition for Post-Conviction Relief in the above captioned case.
4. On April 11, 2017, I, along with Kurt Kingler ("Kurt"), conducted an experiment in which we aimed to observe the burning process of a digital camera and to ascertain

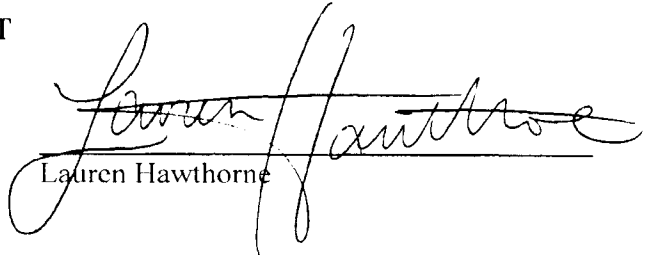


whether or not we could detect a strong odor and observe heavy smoke from the burning of that digital camera.

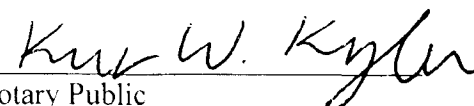
5. To prepare for the experiment, we brought a grill, charcoal, a lighter, and the digital camera to an outdoor open area. For accuracy of the experiment, we burned the same camera that Teresa Halbach used, a Canon PowerShot A310. Kurt piled charcoal into a small metal barrel, or chimney, on top of the grate and lit newspaper beneath the charcoal. Then we waited approximately twenty minutes for the charcoal to heat up before beginning the burning process.
6. Once the coals became hot, I handed Kurt the camera and he placed it on top of the burning charcoal. We watched it burn for approximately fifteen minutes. While it burned, Kurt and I walked all around the grill and alternated standing in the line of smoke, near and far from the grill, and leaning above the grill to see if we could smell any strong or unusual scent. At no point did I smell anything other than burning charcoal.
7. After the camera had been burning for some time, we decided to place the camera underneath the chimney to test if that would alter our results. We agreed that the camera was burning more quickly and intensely beneath the chimney than on top of the coals. After we allowed the camera to burn beneath the chimney for 20 minutes, we removed the chimney from on top of the camera to visually observe it. Its plastic components appeared to have melted to a significant degree and its metal components appeared charred in a similar manner to the camera components recovered from Mr. Avery's burn barrel (*See, e.g., trial exhibits 410, 411*). At no time during the burning of the camera, whether it was on top of the coals or beneath the chimney, did I detect a strong odor of burning plastic or observe heavy smoke.

8. I personally went through the files of Mr. Avery's trial defense counsel, Dean Strang and Jerry Buting, which they gave to our firm when we announced we were taking on Mr. Avery's case. As I went through his files, I noticed a folder marked "John DeHaan." This name stuck out to me because Ms. Zellner had consulted with Dr. John DeHaan, a forensic fire expert, in this case. (Photos of Trial Defense Counsel's File and Copy of CV Found Therein, Group Exhibit 1).
9. Inside the folder was the curriculum vitae of Dr. DeHaan. There were no other files in this folder. Dr. DeHaan did not testify at Mr. Avery's trial. I checked the curriculum vitae of Dr. DeHaan from the trial defense counsel's box against the curriculum vitae provided to our office from Dr. DeHaan in 2017. I determined that the curriculum vitae of Dr. DeHaan in the trial defense counsel's box belonged to the same Dr. DeHaan that Ms. Zellner consulted. (Photos of Trial Defense Counsel's File and Copy of CV Found Therein, Group Exhibit 1).

FURTHER AFFIANT SAYETH NAUGHT


Lauren Hawthorne

Subscribed and sworn before me
this 4th day of May, 2017.


Notary Public

