

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
OGLE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF  
ILLINOIS,  
Plaintiff

VS.

JOSE RICARDO RODRIGUEZ  
Defendant

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**SECOND AMENDED FIRST MOTION TO APPOINT EXPERT WITNESS**

Now comes the Defendant by and through his Assistant Public Defender, DENNIS RILEY, and in support of this Motion, states as follows:

1. He is the Defendant in the above entitled cause.
2. He has been charged in this case with the offense of First Degree Murder in three Counts.
3. At issue in this case will be certain blood samples taken from the scene of the commission of the offense and certain blood exemplars taken from the Defendant and others.
4. He is represented in this cause by one of the Public Defenders of Ogle County.
5. He does not have sufficient funds to provide an expert necessary to his defense.
6. A qualified forensic scientist is necessary to the defense of this cause to allow the Defendant to present an adequate defense.
7. Speckin Forensic Laboratories employs qualified experts in blood sample analysis and has been previously been appointed in this cause.
8. Additional tests are required of certain pieces of evidence received from the State. Speckin Forensic Laboratories has hired \_\_\_\_\_ to conduct such testing.

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9. The cost of said additional testing will not exceed \_\_\_\_\_

WHEREFORE, the Defendant prays that his attorney be allowed to hire \_\_\_\_\_ as an additional expert consulting forensic witness to assist in the defense of this cause; and that such cost and expense be paid by the County of Ogle.

\_\_\_\_\_  
Dennis Riley  
Assistant Public Defender

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