



David Keech

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Summary of Expert Testimony

DUI INVESTIGATION

DUI Training and Experience includes over 700 hours of DUI investigation, drug & alcohol, and testimony training. Certified as an SFST instructor, i9000 instructor and DRE instructor, taught local police academy DUI class for nine years with the majority as the lead instructor. Conducted over 1000 investigations, including own arrests, assisting less experienced officers and reconstructions.

Impairment Identification, using the three phases of a DUI investigation and the indicia of impairment that is observable during those phases. Administering and interpreting basic, standard, and advanced sobriety tests (including horizontal gaze nystagmus) to determine any impairment of a subject.

Drug Recognition, using the signs, and symptoms of drug influence (including alcohol) on the human body to recognize drug impairment and distinguish from any medical impairment. How drugs affect the human body and how the body works to eliminate those drugs, including drug tolerance.

Chemical Testing, using the official regulations ensuring the collection of a valid sample to provide an accurate evidentiary measurement of alcohol or drugs in the subject's body. Including the training, operation, maintenance, and troubleshooting of the CMI i9000 instrument.

CRASH INVESTIGATION

Crash Training and Experience includes over 150 hours of Crash investigation and road safety training, including police driver training. Certified as a level one crash investigator. Conducted over 1000 investigations, ranging from minor property to fatality crashes, including own investigations, assisting other officers and traffic unit reconstructions.

Roadway Factors, using the observation of environmental and scene conditions, pre and post impact markings on the road surface and property damage to determine the events of the crash scenario. Including skid marks or other evidence to estimate reaction times and vehicle speeds.

Vehicle Factors, using the internal and external observations of involved vehicles, including operational condition, damage sustained, and substance transfer or markings. Plus video recordings or other digital evidence available from the vehicle to reveal the events leading to the crash.

Human Factors, using any bodily injuries, victim placement and strike points, driver and passenger statement, independent witness statements, witness view points, and any digital recordings available to help determine proximate cause for the crash.

TRAFFIC STOPS

Training and Experience includes training during the police academy and field training to conduct traffic stops safely and the reasons behind the stop. POST certified police officer who worked primarily on patrol with a focus on traffic safety and enforcement. On average conducted about 1000 traffic stops per year during the almost fourteen year career. Assisting other officers from own and other agencies with their traffic stops.

Colorado Traffic Code, using both state and municipal statutes to conduct moving, equipment and administrative traffic violations to conduct legal traffic stops for various purposes. Including traffic enforcement, suspicious activity, drug interdiction, and high risk stops.

Police Process, using training and experience to know how officers are taught to conduct traffic stops safely starting with the initial violation, predicting a stop location, approaching the vehicle, and conducting business at the vehicle. Including what indicators and behaviors to look for a legal authority with occupants of the vehicle.