

## CASE ANALYSIS

State v. Daniel Reyes (SAMPLE, a fictional case)

Cause No. 30112-CR, 350th District Court, Taylor County, Texas

Prepared by Mehaffey Transcription for defense counsel

***SAMPLE DOCUMENT. Every fact, name, and file in this analysis is fictional. Real deliverables carry a DRAFT FOR ATTORNEY REVIEW banner here.***

### Case Snapshot

#### Charges

Driving While Intoxicated, 2nd (Class A misdemeanor), Tex. Penal Code 49.04. Open container enhancement alleged (offense report, p. 1).

#### Key Dates

| Date             | Event                                   |
|------------------|-----------------------------------------|
| 6/14/2026, 23:42 | Traffic stop, S. 1st St. at Pioneer Dr. |
| 6/15/2026, 00:06 | Arrest                                  |
| 6/15/2026        | Breath refusal documented (DIC-24)      |
| 7/02/2026        | Discovery produced                      |

#### People

Daniel Reyes (defendant). Ofc. R. Malone (arresting officer, Unit 412). Ofc. K. Tran (backup, referenced but no footage produced). Unidentified 911 caller. Maria Reyes (sister, jail calls).

### Statement of Facts

On June 14, 2026 at 23:38, an unidentified caller reported a gray pickup drifting on S. 1st Street. Ofc. Malone stopped the pickup at 23:42 after reporting two fog line crossings; the dashcam shows one touch. Mr. Reyes admitted 'two beers with dinner' (bodycam at 23:47:12), performed FSTs on a sloped shoulder, and was arrested at 00:06:44. During transport he said 'I knew I shouldn't have driven' (bodycam at 00:19:03); no Miranda warning appears on any produced recording before that statement. He declined a breath test at the jail (DIC-24).

### Arguments for Guilt

#### The admission and the refusal

Two recorded admissions of drinking plus a documented breath refusal give the State a clean intoxication narrative, and the refusal is admissible and will be argued as consciousness of guilt.

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### Six HGN clues on camera

Malone narrates six clues in real time. The video does not visibly contradict the narration, and jurors credit contemporaneous narration heavily.

### The transport statement

'I knew I shouldn't have driven' is short, memorable, and on tape. If it survives suppression it is the State's closing line.

## Arguments for Acquittal

### The stop is thinner than the report

The report claims two crossings; the video shows one touch. An anonymous, uncorroborated caller cannot carry the difference, and everything downstream hangs on this stop.

### FST conditions

The walk and turn ran on a visibly sloped shoulder, and the one-leg stand follows 20 minutes of roadside standing. Sally-port video shows normal gait eight minutes later.

### The un-Mirandized transport statement

Post-arrest, pre-warning, in response to continued conversation from the front seat. Strong suppression posture on the produced record, which shows no warning at all.

## Weight of the Arguments

The State's case is an admission plus a refusal plus narrated clues, all resting on a stop the video only partially supports. If the stop survives, the refusal and admissions make trial risky; if the transport statement suppresses and the fog line video is pressed, the State's margin narrows considerably. The missing Tran bodycam and intox video are worth demanding before any evaluation is final: they either fill the State's gaps or widen them.

## Source Index

| Cited as       | File                        |
|----------------|-----------------------------|
| bodycam        | Unit412_Malone_20260614.mp4 |
| dashcam        | Unit412_dash_20260614.mp4   |
| 911 call       | 911_20260614_2338.wav       |
| jail call 2    | Reyes_call_20260621.wav     |
| offense report | OffenseReport_30112CR.pdf   |
| DIC forms      | DIC23_24_25.pdf             |