

THE STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS.

SUPERIOR COURT

STATE OF NEW HAMPSHIRE

v.

GENO JOSEPH MARCONI

218-2024-CR-01426

**STATE'S EXPERT WITNESS DISCLOSURES**

NOW COMES the State of New Hampshire, by and through its attorneys, the Office of the Attorney General, and discloses the following potential experts who may testify at trial in this matter. These disclosures are made out of an abundance of caution, as the State does not believe that the testimony of the individuals listed below would constitute an “opinion” by an expert within the meaning of N.H. R. Evid. 702.

1. Sergeant Hawley L. Rae, New Hampshire State Police

Sgt. Rae’s CV and Digital Evidence Report have been previously provided in discovery to counsel for Defendant. Consistent with her Digital Evidence Report, the State anticipates that Sgt. Rae would testify that she performed an analysis of an extraction and report obtained from a digital device (IMEI 356606641567353), made observations consistent with those in the “ANALYSIS” section of her Digital Evidence Report, and created reports consisted with the “REPORTS” section of her Digital Evidence Report. The extraction analyzed by Sgt. Rae has also been previously provided in discovery to counsel for Defendant.

2. Investigator Robert J. Sullivan, New Hampshire Department of Justice

Investigator Sullivan's CV and reports have been previously provided in discovery to counsel for Defendant. Consistent with his Continuation of Investigation Report dated 08/07/2024, the State anticipates that Investigator Sullivan would testify that he copied a hard drive containing security video footage onto a digital storage device. Consistent with his Forensic Exam report, the State anticipates that Investigator Sullivan would testify that he completed a full file system extraction of user data on an iPhone 12, completed a forensic image of a Dell laptop, processed and redacted privileged communications from both devices, and forwarded the materials to the case investigator for review.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

JOHN M. FORMELLA  
ATTORNEY GENERAL

Date: June 2, 2025

/s/ Joe M. Fincham II  
Joe M. Fincham II, Bar #273596  
Assistant Attorney General  
Criminal Justice Bureau  
Department of Justice  
1 Granite Place South  
Concord, NH 03301  
(603) 271-3671  
joe.m.fincham@doj.nh.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via the Court's e-filing system to counsel of record.

/s/ Joe M. Fincham II  
Joe M. Fincham II