

THE STATE OF NEW HAMPSHIRE
SUPERIOR COURT

STRAFFORD, SS.

MARCH TERM, 2024

State of New Hampshire

v.

Timothy Verrill
219-2017-CR-00072

**AFFIDAVIT IN FURTHER SUPPORT OF SUBMISSION: LIKELY UNAVAILABLE
STATE'S TRIAL WITNESS**

I, Peter Hinckley, being duly sworn, do state the following:

1. I am an attorney licensed to practice in the State of New Hampshire.
2. I have prepared this affidavit. The factual statements made herein are based upon various email, telephonic, and in-person communications that I have had in connection with efforts to locate and contact State's trial witness Vanessa Mango, and are true and accurate to the best of my recollection and knowledge.
3. At about 9:32 p.m. on the evening of Sunday, February 25, Victim Witness Advocate Ashley Taylor received a text message from Vanessa Mango, from the same cellphone number that Ashley Taylor unsuccessfully had repeatedly attempted to make contact with Ms. Mango on prior occasions. The text message read, "Yes. . I have received the texts. Please stop contacting everyone I know. Also, I hope this is scheduled to begin after the 16th because I will be in Costa Rica until then." Ashley Taylor relayed that information to me that same evening by email, which I opened and read the following morning, Monday February 26. That same day, Ashley Taylor sent Ms. Mango a text message in substance thanking her for the text message, and informing her that we needed to speak with her regarding travel arrangements and subpoena service.

4. At about 6:30 p.m. on February 27, Ms. Mango called Ashley Taylor. Ms. Mango relayed to Ashley Taylor that she (Ms. Mango) was staying with her parents in Fort Meyers, Florida, and would be traveling to Costa Rica from March 5 to about March 17.

5. That next morning, Wednesday February 28, I and Ashley Taylor spoke with Ms. Mango by telephone. In that telephone conversation, I discussed with Ms. Mango in substance that she still needed to travel to New Hampshire to testify at trial, and discussed the possibility of her signing a waiver for appearance before a judge in Florida on out-of-state paperwork. We also discussed her flying to New Hampshire on about March 18, upon her return from Costa Rica.

6. Once the address in Fort Meyers where Ms. Mango was staying (with her parents) was verified, I submitted out-of-state subpoena paperwork for her appearance to testify in this case. I also made contact with the Florida State's Attorney's Office in Lee County, where Ms. Mango's parents reside, and discussed the out-of-state subpoena paperwork, as well as Ms. Mango's readily-approaching travel date to Costa Rica.

7. Later on the afternoon of February 28, I was informed that the out-of-state subpoena paperwork had been signed; the Court would have been closed by the time I could drive to obtain certified copies, so I made arrangements to pick up the paperwork first-thing on February 29.

8. At about 8:30 a.m. on February 29, I picked up certified copies of the out-of-state paperwork at the courthouse. That paperwork was in turn mailed to the Florida State's Attorney's Office by next-day mail. I also notified Lindsay Donato from that office, who oversees such matters, that the paperwork would be delivered to her the next day. I also discussed with Ms. Donato Ms. Mango's pending trip to Costa Rica, and the need to serve her

with process before then. Ashley Taylor also repeatedly attempted to contact Ms. Mango by cellphone, but received no response.

9. On Friday, March 1, I was contacted by Ms. Donato and an investigator from her office. The investigator had gone to the house of Ms. Mango's parents, where Ms. Mango was staying, to serve Ms. Mango with a copy of the waiver for her appearance before a Florida judge on the out-of-state paperwork. Ms. Mango was not at the residence, but her parents were. The parents told the investigator in substance that Ms. Mango was staying with them, and verified that she was traveling to Costa Rica. The parents also informed the investigator in substance that they did not know where Ms. Mango was, that they had last seen her the previous afternoon, and that she was an adult and they had no control over her activities. The investigator also repeatedly but unsuccessfully attempted to contact Ms. Mango on her cellphone.

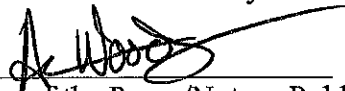
10. On Monday, March 4, Ms. Donato informed me that Ms. Mango that day was found at her parent's house, that she was served with a subpoena for this case, and that signed the waiver for appearance before a judge in Florida. Copies of that subpoena and signed waiver are attached to this affidavit.

11. Ashley Taylor has repeatedly since last Wednesday, up to and including March 4, attempted to contact Ms. Mango by cellphone, but Ms. Mango once again has not answered text messages sent to her on answered calls. Ashley Taylor has reserved a flight for Ms. Mango, as well as local hotel accommodations, and has forwarded all of that information to Ms. Mango by text message. This morning I called Ms. Donato, to thank her for her assistance and also to inform her that we made need assistance in locating Ms. Mango if she does not take her reserved flight. She informed me in substance that once an Order from a Florida judge was issued on Ms. Mango's required appearance in this case, she would forward it to me.

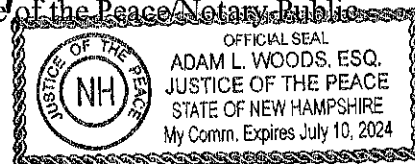
Sworn and signed under the pains and penalties of perjury on this 5th day of March, 2024.



Peter Hinckley
Senior Assistant Attorney General



Justice of the Peace/Notary Public



CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was provided to Julia M. Nye, Esq., and Matthew McNicoll, Esq., counsel of record for the defendant.



Peter Hinckley

THE STATE OF NEW HAMPSHIRE
SUBPOENA

STRAFFORD, SS.

To: Vanessa Mango (DOB 4/1/1978)
15039Balmoral Loop, Fort Myers, Florida 33919

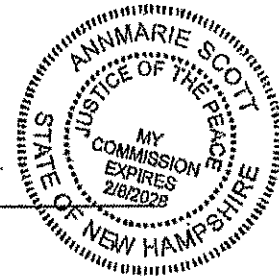
You are required to appear before Strafford County Superior Court, 259 County Farm Road, Dover, New Hampshire, in said county, from the 20th and/or 21st day(s) of March, 2024, at 9:00 o'clock in the forenoon, , to testify to what you know relating to a case then and there to be heard and tried between the State of New Hampshire and Timothy Verrill, defendant.

Hereof fail not, as you will answer your default under penalties prescribed by law.

Dated at Concord, N.H., the 28th day of February, 2024



Justice of the Peace/Notary
My commission expires 2-8-2028



SERVICE OF SUBPOENA

Served in hand this 4 day of March, 2024, at 9:04 a.m./p.m.


Person serving subpoena

Rob Lawrence 1801
Please contact Ashley Taylor, Victim/Witness Advocate, of the Attorney General's Office during normal business hours (Monday-Friday, 8a.m.-4 p.m.) at (603) 271-3671 should you have any questions.

*Fees guaranteed by the State of New Hampshire

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
LEE COUNTY, FLORIDA

IN RE:

REQUEST FOR WITNESS
EXTRADITION IN THE
STATE OF NEW HAMPSHIRE
VS. TIMOTHY VERRILL
CRIMINAL TRIAL

WAIVER

I, Vanessa Mango, 15039 Balmoral Loop, Fort Myers, FL 33919, the material witness named in the certificate signed by the Honorable Justice Mark E. Howard, Judge of the Superior Court of Strafford County, New Hampshire, hereby acknowledge service upon me of the Order to Show Cause granted by the Circuit Court, upon the application of the State of New Hampshire, requiring me to attend and testify in the matter State of New Hampshire v. Timothy Verrill, on March 20 and/or March 21, 2024, at the Strafford County Superior Court located at 259 County Farm Road in Dover, New Hampshire. I understand that I have a right to a hearing in this court prior to the issuance of said subpoena, and that I will be ordered to attend the trial in New Hampshire only if a Judge of this court is satisfied that I am a material and necessary witness.

I hereby voluntarily waive my right to a hearing and my right to contest the Order to Show Cause and agree and consent to the entry of an order requiring me to attend and testify at the time and place stated, and from day to day thereafter during the balance of the trial as directed by the New Hampshire authorities. I understand that I may be held in contempt if I fail to appear at the trial.

DATED: 3/4/24

Vanessa Mango
Vanessa Mango

DATED: 3/4/2024

ROBERT LAWRENCE 1802
Witness