

THE STATE OF NEW HAMPSHIRE
SUPERIOR COURT

STRAFFORD, SS.

MARCH TERM, 2024

State of New Hampshire

v.

Timothy Verrill
219-2017-CR-00072

FURTHER SUBMISSION: STATE'S WITNESS VANESSA MANGO

NOW COMES the State of New Hampshire by and through its attorneys, the Office of the Attorney General, and respectfully presents this further submission with respect to State's witness Vanessa Mango. In support of this submission, the State submits the following:

1. The defendant is charged with, inter alia, first-degree murder, and evidence will commence on March 19, 2024.
2. The State has filed previous submissions, and made an oral record, with respect to its efforts to locate and summon to testify Vanessa Mango. The State further supplements the record in that regard with the following attachments: a judge-signed court order from Florida requiring Ms. Mango to give testimony in the case, and an email from the State Victim-Witness Advocate regarding contact efforts with Ms. Mango. As the State set forth on the record last week, since those email submissions the Victim-Witness Advocate did communicate with Ms. Mango and make travel and hotel arrangements for her. At this time, Ms. Mango is expected to arrive in New Hampshire later today.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

By its attorneys,

John M. Formella
Attorney General

March 18, 2024



Peter Hinckley, NH Bar ID #18708
Senior Assistant Attorney General



Brian Greklek-McKeon, NH Bar ID #269561
Assistant Attorney General
New Hampshire Attorney General's Office
1 Granite Place South
Concord, New Hampshire 03301
(603) 271-3671

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

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

IN RE:

REQUEST FOR WITNESS
EXTRADITION IN
STATE OF NEW HAMPSHIRE
TRIAL

ORDER DIRECTING WITNESS TO APPEAR FOR TRIAL TO TESTIFY

THIS CAUSE having come before the Court and the Court having been advised in the premises on both the fact and the law, the Court finds that:

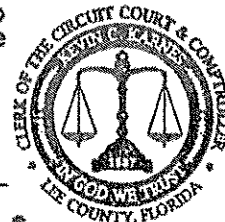
1. Vanessa Mango (D.O.B. 04/01/1978) 15039 Balmoral Loop, Fort Myers, Lee County, Florida, is a material and necessary witness for the State of New Hampshire.
2. The State of New Hampshire has demonstrated through its Application for Certification of Attendance of Out of State Witness Vanessa Mango, that they will comply with all requirements of F.S. 942.02.
3. Further, a Certification of Court from the Honorable Mark E. Howard, Justice of the Strafford County Superior Court, State of New Hampshire was reviewed by this Court.
4. In compliance with F.S. 942.02, the court was prepared to set a hearing in the State of Florida in order to afford witness Vanessa Mango the opportunity to show cause as to why an order should not be entered directing her to appear as a material witness before the Strafford County Superior Court, State of New Hampshire on March 20th 2024, at 9:00 a.m. to give testimony in the jury trial pending in said court.
5. Vanessa Mango has acknowledged service of the Order to Show Cause and voluntarily waived any right to hearing and to contest said Order to Show Cause as to why an order should not be issued requiring his appearance to testify in Dover, New Hampshire.

ORDERED AND ADJUDGED:

Vanessa Mango (D.O.B. 04/01/1978) shall appear before the Strafford County Superior Court, State of New Hampshire on March 20th 2024, at 9:00 a.m to give testimony in the jury trial pending in said court. If witness Vanessa Mango fails without good cause to attend and testify as directed, the witness shall be punished in the manner provided for the punishment of any witness who disobeys a summons issued from a court of record in this state.

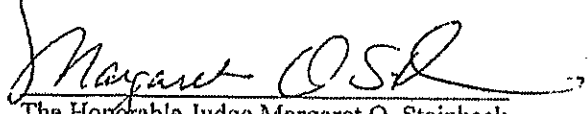
I hereby certify this document to
be a true and correct copy of the
record on file in my office
Kevin C. Karnes, Clerk of the
Circuit Court, Lee County, FL
Dated: 3/6/24

By 
Deputy Clerk



RE: Request for Witness Extradition in the State of New Hampshire

DONE AND ORDERED in Chambers, Lee County, Florida this 6 day of March, 2024.

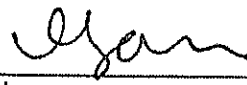

The Honorable Judge Margaret O. Steinbeck

CERTIFICATE BY CLERK

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been furnished to Vanessa Mango, 15039 Balmoral Loop, Fort Myers, Lee County, Florida, and Taryn A. Vaughn, Assistant State Attorney, P.O. Box 399, Fort Myers, Florida, 33902, this 6th day of March, 2024.

CLERK OF THE COURT

BY:


Deputy Clerk



RE: Vanessa Mango 3/8/24

Taylor, Ashley <Ashley.M.Taylor@doj.nh.gov>

Tue 3/12/2024 4:28 PM

To: Hinckley, Peter <peter.r.hinckley@doj.nh.gov>

Cc: Greklek-McKeon, Brian <Brian.N.Greklek-McKeon@doj.nh.gov>

Hi Pete,

I did send Vanessa a copy of the Florida Order via text.

I have yet to hear back from Vanessa after my multiple attempts yesterday 3/11 and today 3/12 for contact.

3/11/24 –

Phone call to Vanessa. The call was picked up but ended soon after a period of dead air. No answer from Vanessa when I said “Hello” or “Vanessa”

Second phone call to Vanessa. Call was again picked up and ended shortly after dead air. No response from Vanessa

Text to Vanessa. No response

3/12/24 –

Text to Vanessa. No response

-Ashley

From: Hinckley, Peter <peter.r.hinckley@doj.nh.gov>

Sent: Monday, March 11, 2024 1:20 PM

To: Taylor, Ashley <Ashley.M.Taylor@doj.nh.gov>

Cc: Greklek-McKeon, Brian <Brian.N.Greklek-McKeon@doj.nh.gov>

Subject: Re: Vanessa Mango 3/8/24

Thank you. Please try contacting her again today and every day this week.

Also, you texted her a copy of the Florida Order, correct

From: Taylor, Ashley <Ashley.M.Taylor@doj.nh.gov>

Sent: Monday, March 11, 2024 1:18 PM

To: Hinckley, Peter <peter.r.hinckley@doj.nh.gov>

Subject: Vanessa Mango 3/8/24

Hi Pete,

Here is a summary of my most recent interaction with Vanessa Mango:

I received a call from Vanessa Mango on Friday, March 8 at 7:30am wanting to discuss the travel arrangements I had secured and sent to her. I confirmed with Vanessa that she received and reviewed the details of her flights on 3/18/24 and 3/24/24 and hotel reservation between 3/18/24 and 3/21/24. Vanessa informed me that something happened to her pre-planned flight to Costa Rica and she was unfortunately unable to leave Florida and still in Fort Myers. Vanessa asked me again the date of her first flight to NH and became panicky saying something along the lines of “I’ll now be in Costa Rica that week and may not be back for the flight.” She became frustrated at having to stay in NH so long for trial and said “she’ll figure it out” and hung up the phone.

I contacted Vanessa later that morning to discuss our previous call in more detail and attempt to work around her Costa Rica trip but I have not yet received a call or text back.