

# SNOW NOTES

## THE WRONGFUL CONVICTION OF JAMIE SNOW AND HOW THEY GOT AWAY WITH IT

### Crime Scene Evidence: Victim's Body Position

#### BPD Case Report by Officer Jeff Pelo 3/31/91

"I started walking across Empire at the far east side of the Clark Station lot. As I walked towards the door at an angle a silver or grey pickup truck pulled into the lot up in front of the door. W/M passenger got out and started for the door. At this point I observed threw the glass door a tennis-shoe sticking out from behind the counter. I told the W/M to get back in his truck. Told W/M driver to go across the street and wait there. At the same time I drew my weapon. I looked threw the windows saw no one. As I entered the station I check the bathroom. As I walk between the counter and the opening in the store room (North side of station) once it was determined that no one was inside I turned and looked down at the victim he was lying on his chest. Legs were slightly bent left arm was under his body. Right arm was bent at elbow towards his chest. Head was facing the west wall. I walked out of the station and requested rescue, possibly the coroner. I attempted to find a pulse after I was back in. None was detectable. I then left to move my squad to start sealing off the area."

#### Interview Audio, 3/2/99 8:25 AM

#### Detective Rick Barkes, Dan Katz, and Officer Jeff Pelo

**Officer Pelo:** I started walking across Empire Street on the east side of the lot. I was walkin toward the east side of the lot. I was wathcin the gas station. As that was goin on a pickup truck with 2 white males pulled up started getting out of the truck. I told em to get in the truck and go across the street; got a little argumentative wanted to know why. At that time I realized there's a tennis shoe stickin out from behind the counter. I ordered the 2 to get in the truck and go across the street and wait. Get my weapon, started looking through the windows from the east side of the building going towards the west to see if there was visibly anyone in there. No one was in there. I entered the front of the station went down cleared the bathroom no one was in the bathroom came back towards the counter there was a little storeroom behind the counter area where the tenant was at. See the tenant layin there. Step past him and cleared the storage room area. There's no one in it so I came back up. Opened the front door. Warned dispatch that it was, don't know exactly what I said but basically it was real, had a man down appeared as if you know, we needed a coroner.

[...]

**Interviewer:** Now you went into the gas station you saw a, a tennis shoe?

**Officer Pelo:** Yes

**Interviewer:** Ok and that was uh sticking out from the counter correct?

**Officer Pelo:** Yes

**Interviewer:** On the floor?

**Officer Pelo:** Yes

[...]

**Interviewer:** How close were you to the building when you saw the shoe?

**Officer Pelo:** I can't give you the, the exact distance it was a south east angle to the building.  
[...]

**Interviewer:** Ok. I'm gonna show you another picture. This was a shot, taken by a crime scene tech. Is that the way the body was when you first observed it?

**Officer Pelo:** No

**Interviewer:** What's different about it?

**Officer Pelo:** He was laying at an angle. A big different angle. About a 90 degree different angle than what he was layin, layin originally. And his shirt's open. When I first saw him, his shirt was no open. It was intact.

**Interviewer:** Ok and when you first saw him, he was laying on his back?

**Officer Pelo:** No he wasn't. He was layin on his chest.

**Interviewer:** Who turned him over?

**Officer Pelo:** I never saw anyone turn him over but my assumption is that Paul Williams turned him over.

**Interviewer:** And why did he do that?

**Officer Pelo:** Because, I don't know why he did that, but I looked back in after I went to get my CPR mask, when I came back he had the body rolled over.

**Interviewer:** Now did he move the body like that?

**Officer Pelo:** He must of cuz there's no one else in...

**Interviewer:** The rest of the people

**Officer Pelo:** This was yeah but

**Interviewer:** And they checked

**Officer Pelo:** Yeah, lifeline and rescue both showed up, but he'd been moved prior to them getting there.

**Interviewer:** He'd been moved by Paul Williams?

**Officer Pelo:** Yes.

**Interviewer:** And he could have been moved by rescue...either one of both could have moved him.

**Officer Pelo:** Yes.

**Interviewer:** Did you, were you in there when rescue was there?

**Officer Pelo:** Yes, but he'd been moved before recuse got there.

**Interviewer:** Ok. So, where he, the picture I was showing you, and I know you said 90 degree angle...

**Officer Pelo:** It was basically a 90 degree angle.

**Interviewer:** Could, coulda been more of a 180 degree? And the reason why I'm asking is in this picture, this is, this is the front of the counter, we got some blood dropping here.

**Officer Pelo:** Why don't, why don't we show also the report, page 6. In yellow I've marked the description of how the body was lain. Yes where it says he was a white male laying on chest, legs were slight bent left, arm was, I'm sorry slightly bent, left arm was under his body, right arm was bent around the elbow towards his chest. His head was turned facing the restroom.

**Interviewer:** So, would you say his body was turned more than 90 degrees?

**Officer Pelo:** To make things easy, when I first went in his head was south, his feet were towards the middle. His face was facin towards the west inside of the building behind the counter. He was layin, he had one arm underneath.

**Interviewer:** And now how, now according to this picture

**Officer Pelo:** His head is now facing the east and I cant see

**Interviewer:** If his head was, if his head was at the west at one point now  
**Officer Pelo:** No. His face was going west. His head was going south. He's gone 180 degrees.  
**Interviewer:** Right.  
**Officer Pelo:** Instead of going south he's now going to the west.  
**Interviewer:** It says northeast here.  
**Officer Pelo:** Northeast. Northeast, he woulda yeah, he was facing, he stopped like this and now when you turn him around  
**Interviewer:** Sure  
**Officer Pelo:** He's now facing this way.  
**Interviewer:** Exactly. That's exactly 180 degrees. 360.  
**Officer Pelo:** 360 would be all the way around. Yeah 180 a 180 is reversal.  
**Interviewer:** Right so maybe a little  
**Officer Pelo:** Maybe a little more than 180 but roughly you're correct  
**Interviewer:** Ok well great. We're just tryin to figure out how the body got to where it was.  
**Officer Pelo:** To make it easier, his head was initially down towards in here.  
**Interviewer:** Right.  
**Officer Pelo:** Up towards in here; on the floor. I can't remember. Parts of him were touching up in the counter or not.

## Susan Claycomb Trial, August 22, 2000

**Officer Jeff Pelo via Teena Griffin:**

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**Officer Pelo:** I asked them if they'd get in the tuck and go across and – the street and wait for me to look at the building. While I was doing that I observed inside the building.

**Teena Griffin:** So you kind of looked through the glass area in there?

**Officer Pelo:** Yes, ma'am.

**Teena Griffin:** And what did you see inside the building?

**Officer Pelo:** Most important thing was a young man's foot sticking out from behind the counter.

[...]

**Teena Griffin:** When you saw the foot sticking out behind the counter, what did you do then?

**Officer Pelo:** I pulled my weapon, and then told the men to get in the trick and get across the street which they did.

**Teena Griffin:** Did you enter the station?

**Officer Pelo:** Yes I looked through the building and ended up going inside, yes.

**Jamie Snow's Trial, January 2, 2001**

**Officer Jeff Pelo via Teena Griffin**

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**Officer Pelo:** And as I was looking at the building I observed a tennis shoe sticking out from behind the counter.

[...]

**Officer Pelo:** I cleared the building to see who was in there, and when I was done I looked down and observed a male laying on the floor.

[...]

**Officer Pelo:** He was laying behind the counter. His position, obviously there was something wrong with him. I assumed he was in need of medical help. I checked for a pulse. I couldn't find one.

**Teena Griffin:** And aside from checking for a pulse did you do anything in terms of moving the body at all?

**Officer Pelo:** No, ma'am.

**Jamie Snow's Trial, January 2, 2001**

**Officer Williams via Teen Griffin**

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**Teena Griffin:** I'm going to show you what's been marked as people's exhibit number nine ask you if you recognize what's depicted there in that photograph.

**Officer Williams:** Yes, I do, ma'am.

**Teena Griffin:** And could you indicate what you recognize that to be?

**Officer Williams:** This is a photograph of inside the Clark Gas Station, and it would be a picture taken if the person taking the picture was facing west; and it's a picture of the boy with his shirt there torn up, which is a result of my cutting it open, and I think you can see pretty much half way between his naval and the intersection where his nipples would be you would see that is a dark spot and that would be what I thought was a bullet hole. And also you'd notice on his left pectoral or deltoid area, another kind of elongated hole, which I thought was consistent with a bullet hole.

[...]

**Teena Griffin:** Now, does this picture show the position that Bill Little was in when you first observed him?

**Officer Williams:** No.

**Teena Griffin:** What's different about it?

**Officer Williams:** Well, he had been moved to put his spine flat on the ground. When you do CPR you have to do that. And also he was behind this counter. And if you get back behind that counter, there is no – no real room to work. A full grown man would be tight with this – with the body in there two men couldn't hardly get in there at all. So he had been moved where there is a little bit more space.

## Officer Williams via Frank Piel Cross Examination

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**Frank Piel:** How was that different, if you can explain it? How was the body – how would that – how had it been moved?

**Officer Williams:** The body had been a more laying on his side like on an arm, maybe the way some people would sleep on their side, and his knees were curled up towards his chest; and he would have been actually physically behind the simulated wood counter, as opposed to that picture, he would have been pulled out to the side of it.

**Frank Piel:** But so in the picture when you first arrived, his body would have been less visible because he would have been – it would have been more behind the wooden counter?

**Officer Williams:** Right.

**Frank Piel:** To the left in that photo, is that right?

**Officer Williams:** You are correct.

[...]

**Frank Piel:** When you first saw the body, was there a tennis shoe sticking out from behind the counter visible?

**Officer Williams:** Well I don't know counsel, because I didn't get at that point, why, I believe sergeant or at that time Officer Pelo had already searched the building, which doesn't take much to have gone through that building and I immediately proceeded behind the counter. So I didn't make any preliminary observations like that I don't guess. I just kinda went right in.

**Frank Piel:** And you rolled him over?

**Officer Williams:** Yes Sir.

**Frank Piel:** And cut his shirt?

**Officer Williams:** Yes Sir.

**Frank Piel:** Straightened out his legs a little bit?

**Officer Williams:** That happened when he rolled yes sir.

**Frank Piel:** Okay, you didn't flip flop the body so the head was where the feet had been though, did you?

**Officer Williams:** No

**Frank Piel:** Well, I didn't see then in that picture that his shoes were anywhere sticking out from behind the counter. Did you see them sticking out?

**Officer Williams:** No not in that picture, no Sir.

## Teena Griffin Redirect

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**Teena Griffin:** Officer Williams, just to clarify, when you first went inside the station and you saw Bill Little on the floor behind the counter you indicated initially that he was on his left side. Is that correct?

**Officer Williams:** Yes ma'am.

**Teena Griffin:** And I'm showing you what's now marked as People's exhibit number three, do you recognize what that area is?

**Officer Williams:** Yes, I certainly do.

**Teena Griffin:** What do you recognize that area to be?

**Officer Williams:** This is a picture of that area behind the counter. This would be taken and, in fact, probably my squad car you can see is in the background parked there, and this would be taken if you were facing south. I think you can see a little red dot. And that's the taillight of my car.

**Teena Griffin:** Now down there at the bottom of that picture is the green floor there that's in the corner of that counter area. Is that correct?

**Officer Williams:** Yes ma'am.

**Teena Griffin:** And that floor area there would be at least part of the area where Bill Little would have been lying. Is that correct?

**Officer Williams:** When—when—when I—when I came into the station that's where the body was at, and you can see its not much space.

**Teena Griffin:** And tell me if this is an accurate statement or not. If he is laying on his left side there inside that corner, if you set him up so that his back was against the L shape of the counter and then brought him out to the end of the counter and laid him out and spread his legs out, would that be an indication of the movement he was involved here, just by sitting him up and then laying him down?

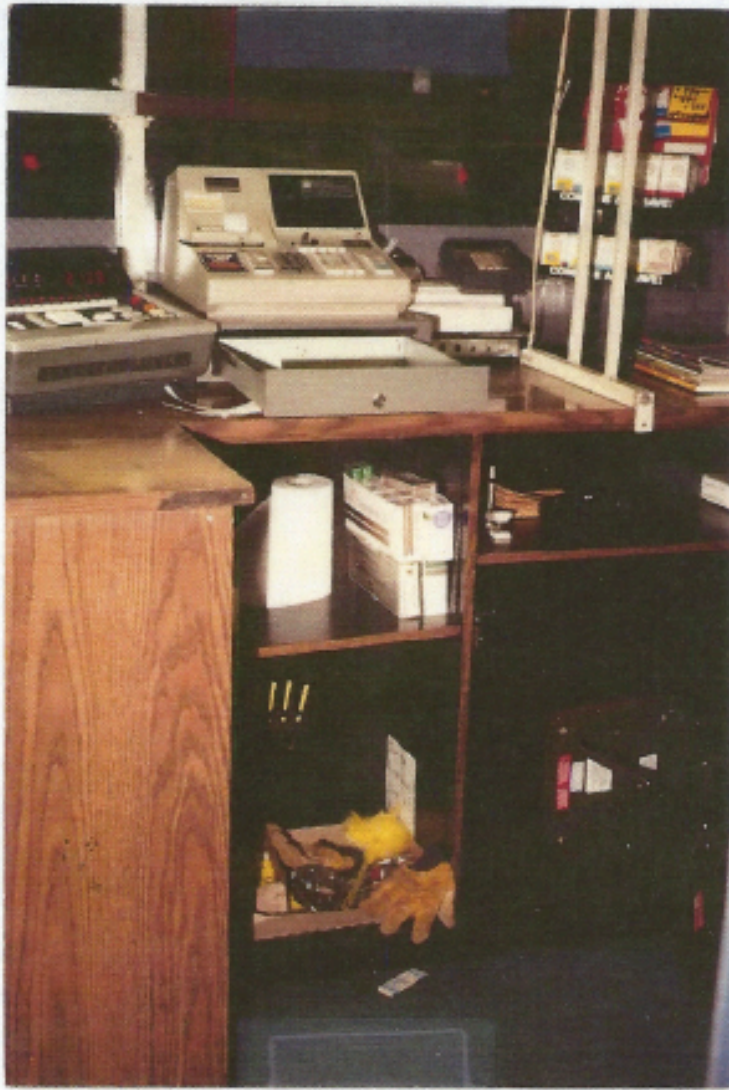
**Officer Williams:** Well generally speaking, yes, that would be generally how I think I had done that.

#### **Jeff Pelo via Lesley Pires 4/1/2020**

**Lesley Pires:** Which way was he laying—head towards the store room? What did you mean when he said he was flipped 180 degrees in the crime scene photos?

**Jeff Pelo:** He was behind the counter, head to the south, face was looking towards the west, feet to the north. Door is on the south side of the store, room is on the north. I mean his body was moved. He was no longer behind the counter. 180 degrees is not accurate. That was either Katz or Barkes saying that during the March 2nd 1999 interview. I stress he was moved by Williams from behind the counter and Williams cut open his shirt. This was a big DO NOT DO by BPD SOP.





State's  
Exhibit  
#3



State's  
Exhibit  
#4





**State's Exhibit #9 (Edited):**

