

1 THE COURT: We'll just be at recess until  
2 Dr. Jacks gets here.

3 (A recess was taken.)  
4

5 MOVANT'S REBUTTAL EVIDENCE

6 DR. RICHARD JACKS, having been first duly sworn, testified:

7 DIRECT EXAMINATION

8 BY MR. HARMAN:

9 Q State your name and occupation, please.

10 A Richard K. Jacks, D.L. Physician.

11 Q Dr. Jacks, are you familiar and acquainted with Sandra  
12 Hemme?

13 A Yes, she's the lady sitting in front of me.

14 Q Was she a patient at the hospital at St. Joseph State  
15 Hospital?

16 A Yes, she was.

17 Q Are you employed by the St. Joseph State Hospital?

18 A I am.

19 Q What is your position there?

20 A Chief of the medical staff.

21 Q In connection with your position at the St. Joseph State  
22 Hospital, did you become familiar with the records being  
23 kept on Sandy Hemme at the St. Joseph State Hospital?

24 A Yes, I did.

25 Q Were you aware that Miss Hemme was charged with the

1 homicide in the Patricia Jeschke case?

2 A. I was.

3 Q. After the time of her arrest on that charge, did you  
4 have any conversations over the telephone or in person  
5 with someone who represented himself to be her attorney?

6 A. No.

7 Q. There's a gentleman seated on the front row in a light  
8 blue plaid suit, do you see him?

9 A. Yes, I do.

10 Q. Seated almost directly behind Miss Hemme on the front  
11 row, do you see that individual?

12 A. Yes, I do.

13 Q. Have you ever discussed Sandra Hemme's file with that  
14 person, to your knowledge?

15 A. Not to my knowledge.

16 MR. HARMAN: That's all, Judge.

17 CROSS-EXAMINATION

18 BY MR. SHEPHERD:

19 Q. Dr. Jacks, I just introduced you to Mr. Sullivan -- the  
20 man just pointed out to you a few minutes ago -- isn't  
21 that right?

22 A. Yes, you did.

23 Q. And do you recall and I indicated to you that Mr. Sullivan  
24 had previously indicated he had talked to you about the  
25 Sandra Hemme case?

1 A Yes, you did.

2 Q Do you recall what your response to me was, sir?

3 A I think my response was that I had many calls about  
4 this one.

5 Q So your---

6 THE COURT: Many calls?

7 A I had many calls concerning Miss Hemme.

8 Q Your testimony is that you don't recall talking to  
9 Mr. Sullivan about Sandra Hemme, is that right?

10 A No, I cannot recall a specific situation or a party who  
11 introduced himself by that name and then a discussion  
12 followed.

13 Q Do you recall how many persons you had occasion to talk  
14 to about Sandra Hemme after she was charged with the  
15 capital murder?

16 A Yes, several.

17 Q Sir, are you saying that you did not talk to  
18 Mr. Sullivan?

19 A To the best of my recollection, no, I did not talk to  
20 any man with the last name of Sullivan.

21 Q Is that your best answer, you just can't ever remember  
22 talking to him?

23 A Yes.

24 MR. SHEPHERD: No further questions.

25

1 REDIRECT EXAMINATION

2 BY MR. HARMAN:

3 Q Have you reviewed the log of visitors and persons in-  
4 specting the records of Sandra Hemme that is kept at  
5 the St. Joseph State Hospital?

6 A Our Custodian of Records has entries.

7 Q Are you familiar if there is or there is not any entry  
8 of Mr. Sullivan examining those records?

9 A I'm not familiar with any entry that has been made where  
10 a Mr. Sullivan has requested information or talked to  
11 her about the records. I'm not familiar with any such  
12 entry.

13 Q Specifically, do you remember a situation where someone  
14 identifying themselves as Mr. Sullivan spent three or  
15 four hours examining those records and talking with you  
16 about the case, and the records?

17 A I have no knowledge of that.

18 MR. HARMAN: That's all, Judge.

19 RE-CROSS-EXAMINATION

20 BY MR. SHEPHERD:

21 Q Doctor, do you recall when you last reviewed the Sandra  
22 Hemme file?

23 A Yes, it would have been in 1981 or 1982.

24 MR. SHEPHERD: No further questions, your  
25 Honor.