



AI in Federal Defense: Practical Tools

Felix Valenzuela

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Problem

Overwhelming
demands

Name	Date modified	Size
2019.08.03 FBI interview notes cover Bryan Crusius (DAO HD1 serial 100).pdf	9/13/2019 2:30 PM	2 KB
2019.08.03 FBI interview notes cover Emily Crusius (DAO D41 Dallas Serial 21).pdf	9/24/2019 4:07 PM	2 KB
2019.08.03 FBI interview notes cover Emily Crusius (DAO HD1 serial 275).pdf	8/16/2019 12:36 PM	2 KB
2019.08.03 FBI interview notes cover Lori Crusius (DAO D41 Dallas Serial 3).pdf	9/24/2019 4:07 PM	2 KB
2019.08.03 FBI interview notes cover Lori Crusius (DAO HD1 serial 178).pdf	8/13/2019 5:50 PM	2 KB
2019.08.03 FBI interview notes Cynthia Brown (DAO-D92-img-602115632-P92-94).pdf	10/19/2020 11:24 AM	481 KB
2019.08.03 FBI interview notes Emily Crusius (DAO-D36-9. Evidence-Lab Request-P22-31).pdf	10/19/2020 8:53 AM	3,259 KB
2019.08.03 FBI interview notes Emily Crusius (DAO-D36-9. Evidence-Lab Request-P32-42).pdf	10/19/2020 8:54 AM	3,449 KB
2019.08.03 FBI interview notes John Litwin (DAO-D92-img-602120053-P40-41).pdf	10/19/2020 11:58 AM	267 KB
2019.08.03 FBI interview notes Larry Brown (DAO-D92-img-602115632-P92-94).pdf	10/19/2020 11:24 AM	481 KB
2019.08.03 FBI interview notes Lori Crusius (DAO-D36-9. Evidence-Lab Request-P8-16).pdf	10/19/2020 8:51 AM	2,410 KB
2019.08.03 FBI interview notes Scott Averitt (DAO-D36-9. Evidence-Lab Request-P94).pdf	10/19/2020 8:59 AM	739 KB
2019.08.03 FBI interview notes Shannon Green (DAO D37 serial 47).pdf	1/15/2020 11:39 AM	1,280 KB
2019.08.03 FBI interview notes Shannon Green (DAO D41 Dallas Serial 13).pdf	9/24/2019 4:08 PM	594 KB
2019.08.03 FBI interview notes Shannon Green (DAO HD1 serial 299).pdf	8/16/2019 12:37 PM	594 KB
2019.08.03 FBI Interview Roberto Jurado (DAO D37 Veh. Rec. Serial 4 1002524).pdf	9/15/2022 8:08 AM	681 KB
2019.08.03 FBI interview Scott Averitt (DAO D40 serial 626).pdf	1/16/2020 7:33 AM	336 KB
2019.08.03 FBI interview Scott Averitt (DAO D41 Dallas Serial 58).pdf	9/24/2019 4:08 PM	365 KB
2019.08.03 FBI interview Shannon Green (DAO D37 serial 47).pdf	8/13/2019 5:47 PM	415 KB
2019.08.03 FBI interview Shannon Green (DAO D41 Dallas Serial 13).pdf	9/24/2019 4:08 PM	384 KB
2019.08.03 FBI interview Shannon Green (DAO HD1 serial 18).pdf	8/13/2019 5:48 PM	348 KB

973 items

Problem

**Overwhelming
demands**

**Scarce
resources**

Limited time



Solution

Automate
Repetitive
Tasks





**Collier v. Zambito**

Court of Appeals of New York - February 17, 2004 - 1 N.Y.3d

Document

Images (1)

Negative Treatment (5)

KeyCite Negative Treatment☐ Select all items No items selected**Negative Direct History**

The KeyCited document has been negatively impacted

There is no negative direct history.

Negative Citing References (5)

The KeyCited document has been negatively referenced

Treatment	Title
☐ Declined to Extend by	1. Hastings v. Sauve Most Negative 967 N.Y.S.2d 658, 989 N.E.2d 940, 21 N.Y.3d 122, 2013 N.Y. Slip Op. 03120, N.Y. (NO. 78) AGRICULTURE - Animals. A landowner or animal owner could be liable for negligently allowing a farm animal to stray from property: ...proclivity to act in a way that puts others at risk of harm" id. at 597, 815 N.Y.S.2d 16, 848 N.E.2d 463, quoting Collier v. Zambito, 1 N.Y.3d 444, 447, 775 N.Y.S.2d 205, 807 N.E.2d 254 [2004]). We have followed Bard in two more recent cases...
☐ Distinguished by	2. Tilson v. Russo 818 N.Y.S.2d 311, 30 A.D.3d 856, 2006 N.Y. Slip Op. 05070, N.Y.A.D. 3 Dept., (NO. 98610) TORTS - Animals. Rider voluntarily assumed risk that she would be bitten by horse. ...case law imposing strict liability upon owners of animals with known "vicious propensities" for harm caused as a result of those propensities is misplaced (see Collier v. Zambito, 1 N.Y.3d 444, 447, 775 N.Y.S.2d 205, 807 N.E.2d 254 [2004] ;see also <i>Bard v. Jafinke</i> , 6 N.Y.3d 592...

KeyCite®

reversed or overruled

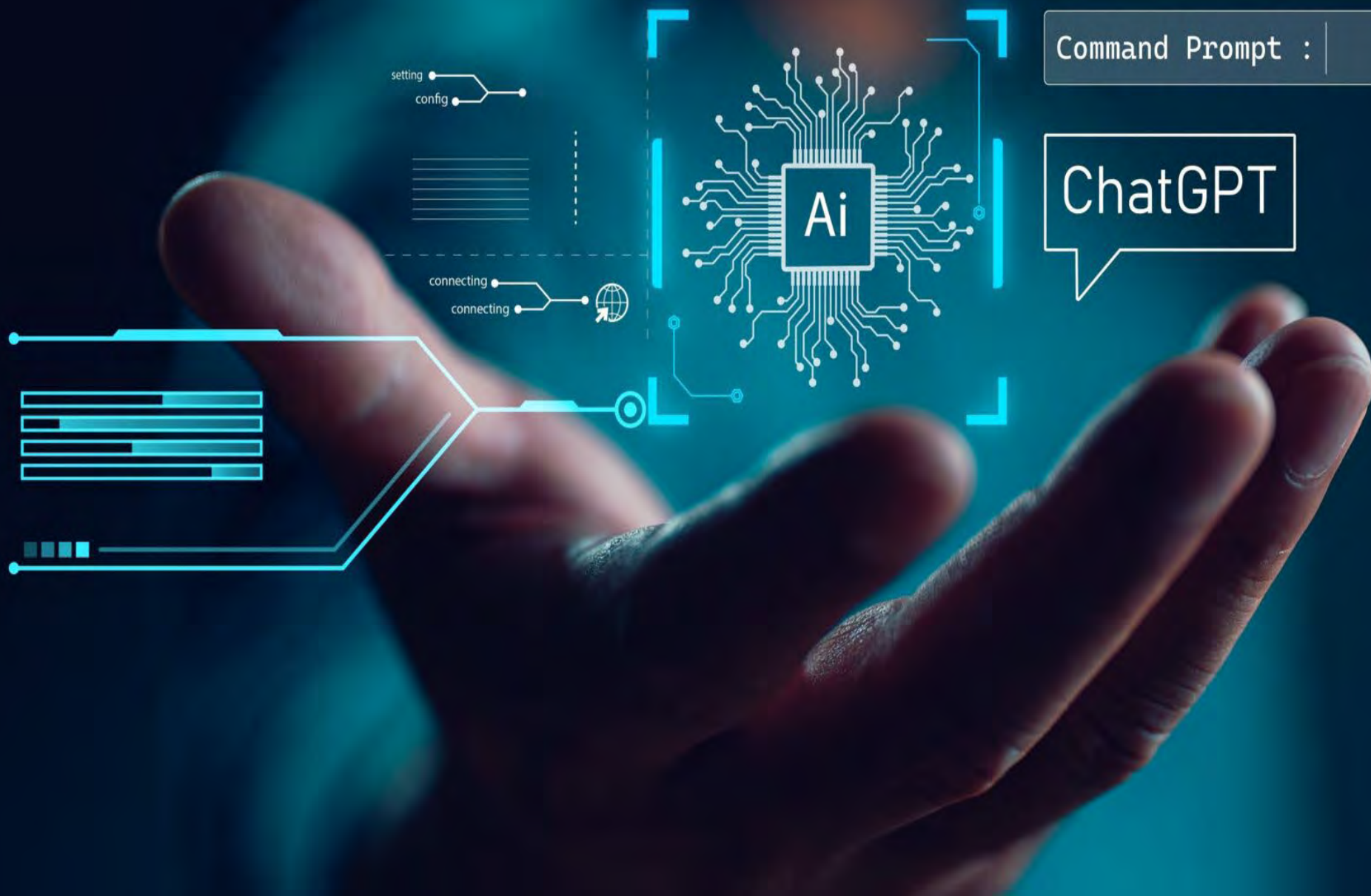
- Statutes & Regulations - proposed legislation or rule available, court decision has questioned validity, or prior version received negative treatment from a court
- Patents & Trademarks - not infringed, but did not rule on its validity, all or part valid and not infringed, held a trademark was not diluted, or held a trademark was not violated by unfair competition
- Cases & Administrative Decisions - no longer good for at least one point of law
- Statutes & Regulations - amended, repealed, superseded, or held unconstitutional or preempted in whole or in part
- Patents & Trademarks - all or part is invalid, invalid and not infringed, all or part of a patent is unenforceable due to the patentee's inequitable conduct, or a trademark is cancelled
- A blue-striped flag indicates a document has been appealed to the U.S. Courts of Appeals or the U.S. Supreme Court (excluding appeals originating from agencies).
- The Overruling Risk warning indicates that a document may no longer be good for at least one point of law based on its reliance on an overruled or

Close

A close-up photograph of a person's hands, wearing a white long-sleeved shirt, inserting a white document into a metal filing cabinet. The cabinet has many drawers, and the person is focused on the task. The background is a bright, out-of-focus window.

Solution

Automate
Repetitive
Tasks



Command Prompt :

ChatGPT

Ai

setting

config

connecting

connecting



Automation: Customization

Customize ChatGPT

Custom Instructions ⓘ

What would you like ChatGPT to know about you to provide better responses?

I am a federal criminal defense attorney whose office is in the Western District of Texas, El Paso Division; this division is bound by the Fifth Circuit Court of Appeals caselaw.

178/1500

How would you like ChatGPT to respond?

characters

- Open sentences with familiar information
- verbs should name specific actions, so do not bury actions in abstract nouns
- put least familiar, most complex, most difficult to understand ideas at the end of a sentence
- through a passage, focus on a few topics that define what that

1491/1500

GPT-4 Capabilities ⓘ

-  Web Search ☒
-  DALL·E ☒
-  Code ☒

Enable for new chats ☒

Cancel Save



Automation:

Education



Office	TDCAA Weekly Case Summaries March 7, 2025 - Weekly Case Summaries: ...	Mar 7
es	LawOffice Latest Case: EX PARTE MOSQUERA (Criminal Law) - Free Texas C...	Mar 6
	the Jasuta-Schulman report for Monday March 3rd, 2025 - How do I sign up to rec...	Mar 2
Office	TDCAA Weekly Case Summaries February 28, 2025 - Weekly Case Summari...	Feb 28
es	LawOffice Latest Case: MAHMOUD v. STATE (Constitutional Law) - Free Texa...	Feb 27
Office	TDCAA Weekly Case Summaries February 7, 2025 - Weekly Case Summarie...	Feb 7
Office	TDCAA Weekly Case Summaries January 31, 2025 - Weekly Case Summarie...	Jan 31
Office	TDCAA Weekly Case Summaries January 24, 2025 - Weekly Case Summarie...	Jan 24
es	LawOffice Latest 2 Cases: STATE v. CUARENTA (Criminal Law), STATE v. HATT...	Jan 23
Office	Weekly Case Summaries January 17, 2025 - Weekly Case Summaries: Janua...	Jan 17
Office	TDCAA Weekly Case Summaries January 10, 2025 - Weekly Case Summarie...	Jan 10
Office	TDCAA Weekly Case Summaries January 3, 2025 - Weekly Case Summaries...	Jan 3
Office	TDCAA Weekly Case Summaries December 20, 2024 - Weekly Case Summa...	12/20/24
Office	Latest 2 Cases: BRADSHAW v. STATE (Criminal Law), STEELE v. STATE (Crimi...	12/19/24
Office	TDCAA Weekly Case Summaries December 13, 2024 - Weekly Case Summa...	12/13/24
es	LawOffice Latest 3 Cases: Ex parte Bodden (Criminal Law), Ex parte Stark (Cr...	12/12/24
Office	Latest 5 Cases: OCHOA v. STATE OF TEXAS (Civil Rights), FINLEY v. STATE O...	11/28/24
Office	TDCAA Weekly Case Summaries November 22, 2024 - Weekly Case Summa...	11/22/24
es	LawOffice Latest 2 Cases: NIXON v. STATE (Criminal Law), SWENSON v. STAT...	11/21/24
Office	TDCAA Weekly Case Summaries November 15, 2024 - Weekly Case Summar...	11/15/24



TEXAS DISTRICT & COUNTY ATTORNEYS ASSOCIATION

[Weekly Case Summaries: February 28, 2025](#)

Texas Court of Criminal Appeals

[Irsan v. State](#)

No. AP-77,082

2/26/25

Issue:

What is the standard of review to be used when, after the defendant engages in inappropriate courtroom behavior, the defendant asks the trial judge to inquire into the jurors' ability to remain fair and impartial?

Holding:

Abuse of discretion. In this capital murder–death penalty case, the defendant killed his son-in-law and one of his daughter's friends during different criminal transactions but pursuant to the same scheme and course of conduct: to "clean the stain on his honor" because his daughter had married a man outside her father's religion. Near the end of the guilt phase of trial, four jurors approached the bailiff individually and told him that they were concerned for the prosecutor's safety because the defendant had given the prosecutor a "look of nastiness" and "made a snapping finger" motion

Designed for busy attorneys, each episode distills case law, sentencing guidelines, trial strategies, and updates into engaging, digestible discussions. Whether you're in court, communi

... **Show more**

5 ★ (1)

Education



February 2025 Sentencing Updates and Case Summaries

EPTX Legal Updates

Sentencing Partners provides an overview of recent amendments to the 2023 federal sentencing guidelines, specifically addressing career offender status, firearm offenses, supervised release violations, and drug...

Sunday • 20 min 16 sec



Sentencing Guidelines: Multiple Crimes of Violence as a Single Sentence

EPTX Legal Updates

The document provides guidance on calculating criminal history scores under the United States Sentencing Guidelines, specifically regarding multiple crimes of violence. It explains how to assign points under §4A1.1(d)...

Mar 7 • 14 min 50 sec



Supreme Court Case Law Update: Federal Sentencing - 2024

EPTX Legal Updates

The United States Sentencing Commission provides this document to assist in understanding sentencing guidelines, but it's not definitive, comprehensive, or binding. It summarizes Supreme Court cases related to...

Mar 6 • 15 min 10 sec





Automation:

Discovery
Processing

Message ChatGPT

Attach file



Create image



Brainst

A quien corresponda:

Mi esposo y yo llevamos 11 años de casados, este año nos casaríamos por la iglesia en junio 22. El estuvo yendo a la iglesia a tomar pláticas de confirmación para casarnos por la iglesia. También tomo pláticas prebautismales el año pasado para bautizar a nuestra hija.

What can I help with?

Handwritten

Handwritten letter in Spanish. First, transcribe it. Then, translate it into English.

this is a handwritten letter in Spanish. first, transcribe it. then, translate it into English.



Create image



Analyze images



Summarize text



Help me write

More

Transcription (in Spanish):

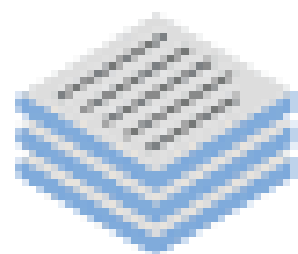
A quien corresponda:

Mi esposo y yo llevamos 11 años de casados, este año nos casaríamos por la iglesia en junio 22. Él estuvo yendo a la iglesia a tomar pláticas de confirmación para casarnos por la iglesia. También tomó pláticas prebautismales el año pasado para bautizar a nuestra hija.

Translation (into English):

To whom it may concern:

My husband and I have been married for 11 years, and this year we are getting married in the church on June 22. He has been attending church to take confirmation classes to get married in the church. He also took pre-baptismal classes last year to baptize our daughter.



casertext



[Workspace](#)

Workspace management

File management

Database management

Favorites

Archived matters

Databases / State v Hall (Felix Valenzuela Firm)

State v Hall Files

Manage access (Only me) >

More Actions ▾

Upload Files

Search...

Filters

Columns

Density

File name	Size	Date added	
JGH Reporter's Record (Vol. 94).pdf	26.63 KB	5/6/24, 1:05 PM	
JGH Reporter's Record (Vol. 93).pdf	26.63 KB	5/6/24, 1:05 PM	
JGH Reporter's Record (Vol. 92).pdf	26.63 KB	5/6/24, 1:05 PM	
JGH Reporter's Record (Vol. 91).pdf	26.62 KB	5/6/24, 1:05 PM	
JGH Reporter's Record (Vol. 90).pdf	26.66 KB	5/6/24, 1:05 PM	
JGH Reporter's Record (Vol. 89).pdf	41.39 KB	5/6/24, 1:05 PM	
JGH Reporter's Record (Vol. 88).pdf	18.21 KB	5/6/24, 1:05 PM	
JGH Reporter's Record (Vol. 87).pdf	20.51 KB	5/6/24, 1:05 PM	
JGH Reporter's Record (Vol. 86).pdf	126.6 KB	5/6/24, 1:05 PM	

✔ Your results are ready!

FILES (94)

 JGH Reporter's Record...  JGH Reporter's Record...  JGH Reporter's Record...

[Show 91 more](#)

QUESTIONS (2)

 [Save to favorites](#)

1. What actions did Bill Hicks take as a prosecutor in the case?
2. summarize hicks's role, as compared to other prosecutors on the case.

[View results >](#)



Review Documents

 I understand you want to find information related to the actions of Bill Hicks as a prosecutor in the case.

Review Overview

Pulled from State v Hall | May 7, 2024

Search...

Filters

Columns

Density

Documents	Hicks actions as prosecutor	Hicks role vs other prosecutors
JGH Reporter's Record (Vol. 84).pdf	—	Prosecution team member
JGH Reporter's Record (Vol. 83).pdf	Prosecutorial duties	Lead prosecutor
JGH Reporter's Record (Vol. 82).pdf	Prosecution activities	Lead prosecutor role
JGH Reporter's Record (Vol. 81).pdf	Prosecutorial actions	Central prosecutorial role
JGH Reporter's Record (Vol. 80).pdf	Legal procedures	Leading prosecutorial role
JGH Reporter's Record (Vol. 79).pdf	Varied legal actions	Lead role
JGH Reporter's Record (Vol. 78).pdf	Prosecutorial duties	Central, proactive role
JGH Reporter's Record (Vol. 77).pdf	—	Lead forensic analysis

Rows per page: 20 1-20 of 94

Is this helpful?

Download review for all documents

F

Felix Valenzuela 10:23 PM

Give me a timeline of important events



CoCounsel 10:23 PM

Timeline

5% Complete



FILES (94)

 JGH Reporter's Record...  JGH Reporter's Record...  JGH Reporter's Record...

[Show 91 more](#)

 [Email me when complete](#)

[Cancel](#)

[View results >](#)

☐		2002, at 3:30 PM.	
☐	October 20, 2002	The location of the pistol was uncertain, but it could have been with the witness.	JGH Repo... (page 183)
☐	October 21, 2002 6:00 AM	A witness did not see Justen Grant Hall at the address on Resler at 6 a.m.	JGH Repo... (page 115)
☐	October 22, 2002	Justen Hall picked up an extension cord the night of October 22, 2002.	JGH Repor... (page 55)
☐	October 25, 2002	A document was billed to Justen Hall at 8517 Lakehurst Road, El Paso, Texas, 79912.	JGH Repor... (page 48)
☐	October 27, 2002	Justen Grant Hall had sex with Melanie the night before October 28th, 2002.	2004.11.23 ... (page 57)
☐	October 28, 2002	Justen Grant Hall intentionally caused the death of Melanie Billhartz by strangling her with a ligature in El Paso County, Texas.	JGH Repor... (page 19) JGH Repor... (page 14) +2 files

Martel Jail Calls Database Details



Chat

Results

F

Felix Valenzuela Oct 23 9:51 AM

these are the transcripts of phone calls that my clients (Randy Martel and Chris Martel) have made while they have been incarcerated, charged with murder. Are there any calls where they admit guilt or culpability? The decedant is Julio Minjares (aka Diablo) and the government's chief witness will be Armie Trujillo.



CoCounsel Oct 23 9:51 AM

Search a Database

Alright, I'm going to search through the database for any calls where your clients, Randy Martel and Chris Martel, may have admitted guilt or culpability in relation to the charges against them. This includes any mentions of Julio Minjares (aka Diablo) and the government's key witness, Armie Trujillo.



Your results are ready!



Starter Apps

[View on GitHub](#)



System Instructions



 RECO0002.MOV
Finished downloading. [✓](#)

Explore this video via:

 A/V captions

 Paragraph

 Key moments

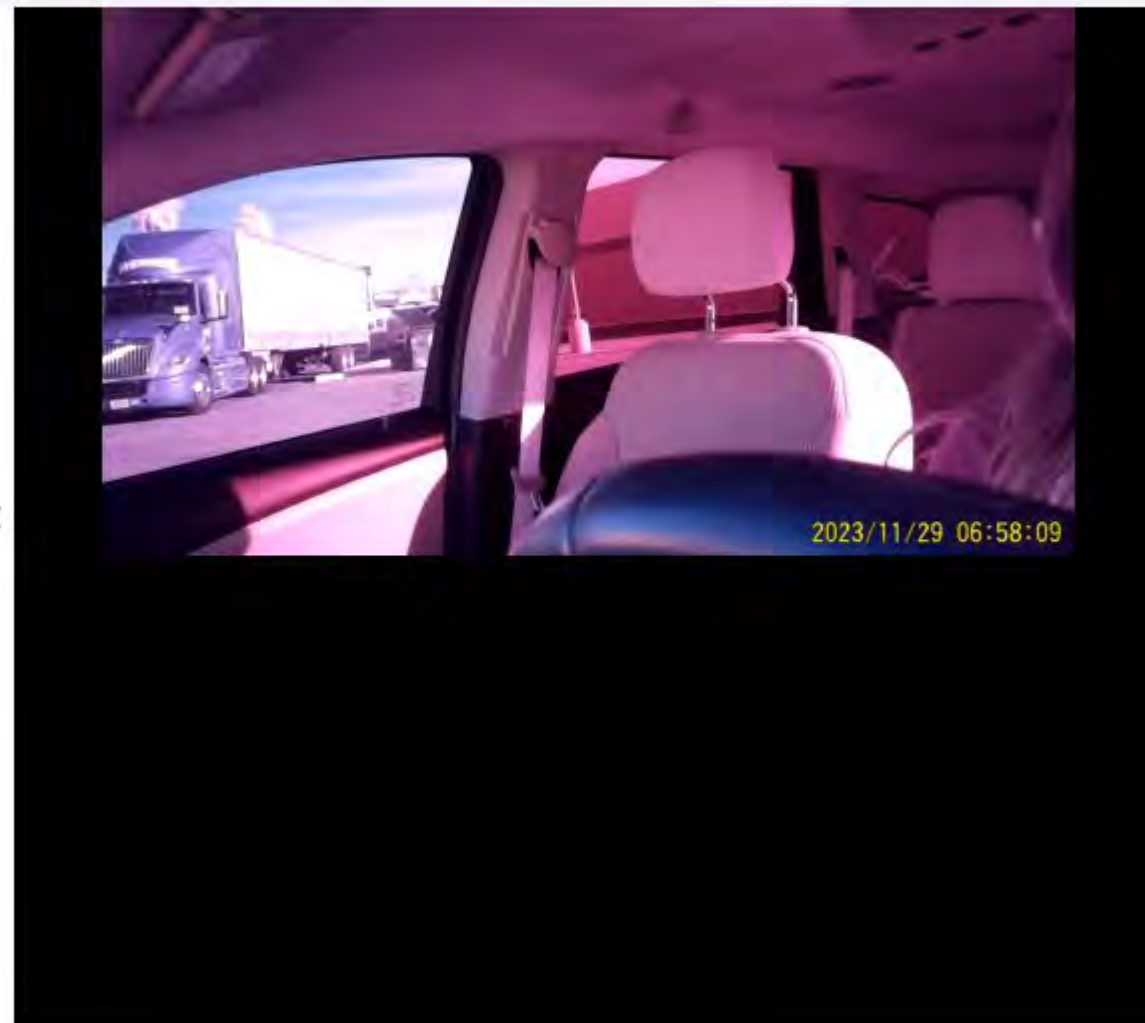
 Table

 Haiku

 Chart

 Custom

 Generate



Type something  Run 

For each scene in this video, describe the scene, in detail, along with any spoken text placed in quotation marks. Display the output as plain text.

- 00:00 The camera faces forward from inside a car, parked in a lot with a blue WERNER semi-truck visible in the driver's side window. The window is rolled down, and light shines in.
- 00:10 The window goes all the way down. "Hi." "Hi."
- 00:15 "Andrea, just coming."
- 00:28 "Oh, thank you."
- 00:32 A man wearing a grey graphic t-shirt reading "CLASSICALLY TRAINED: Nintendo" approaches the open driver's side window of the vehicle and looks inside. He has short dark hair, a beard, and a tattoo on his left forearm.
- 00:33 "Hi." "Hi." "What's up?" "How's it going?" "Good and you?" "Good."
- 00:38 "Alright, so I have this scale. The last time I got looking short."
- 00:48 "It would be so cool, I'm going to get your number." "Pardon?" "Yeah, so she has it." "Oh, she has it?" "Yeah, I've been talking to."
- 00:58 "3.4 something since 3.7, okay. So, by right."
- 01:03 "Okay, so here's the deal. She's saying 16. What I was told it was 15. It was 15 when you were getting two. 15 for two." "She's she told me yeah, so I was going to drop it to 15 if you got it to two."
- 01:17 "Here we go. So, I only have How do you want to do this because I only have 15. That's what we had a brain on." "Uh I mean. I mean you could take some out or I'll come up the 100 bucks and meet up with you guys." "I'll I'll give it to you and you know if you're going to be a reoccurring customer, you know just get back to me on the next one."
- 01:42 "Yeah, want to count it?" "Yeah."
- 01:46 "What's your name?" "Victor you?" "Tris, Mandy." "Mandy? Nice to meet you." "Nice to meet you. You look very clean."
- 01:53 "Yeah. I don't know if you just deal or you. I just don't, I'm not a user." "Oh yeah, I could tell."
- 01:58 "It's Um, I'm coming."
- 02:00 "It's bad it's bad for my business to use." "Yeah I don't uh I don't use either."
- 02:09 "Yeah I could tell that too."



Automation:

Communal
Sentiment
Analysis

Message ChatGPT

Attach file



Create image



Brainst



KVIA ABC 7.txt

Document



CBS4.txt

Document



Fitfam.txt

Document



KFox14news.txt

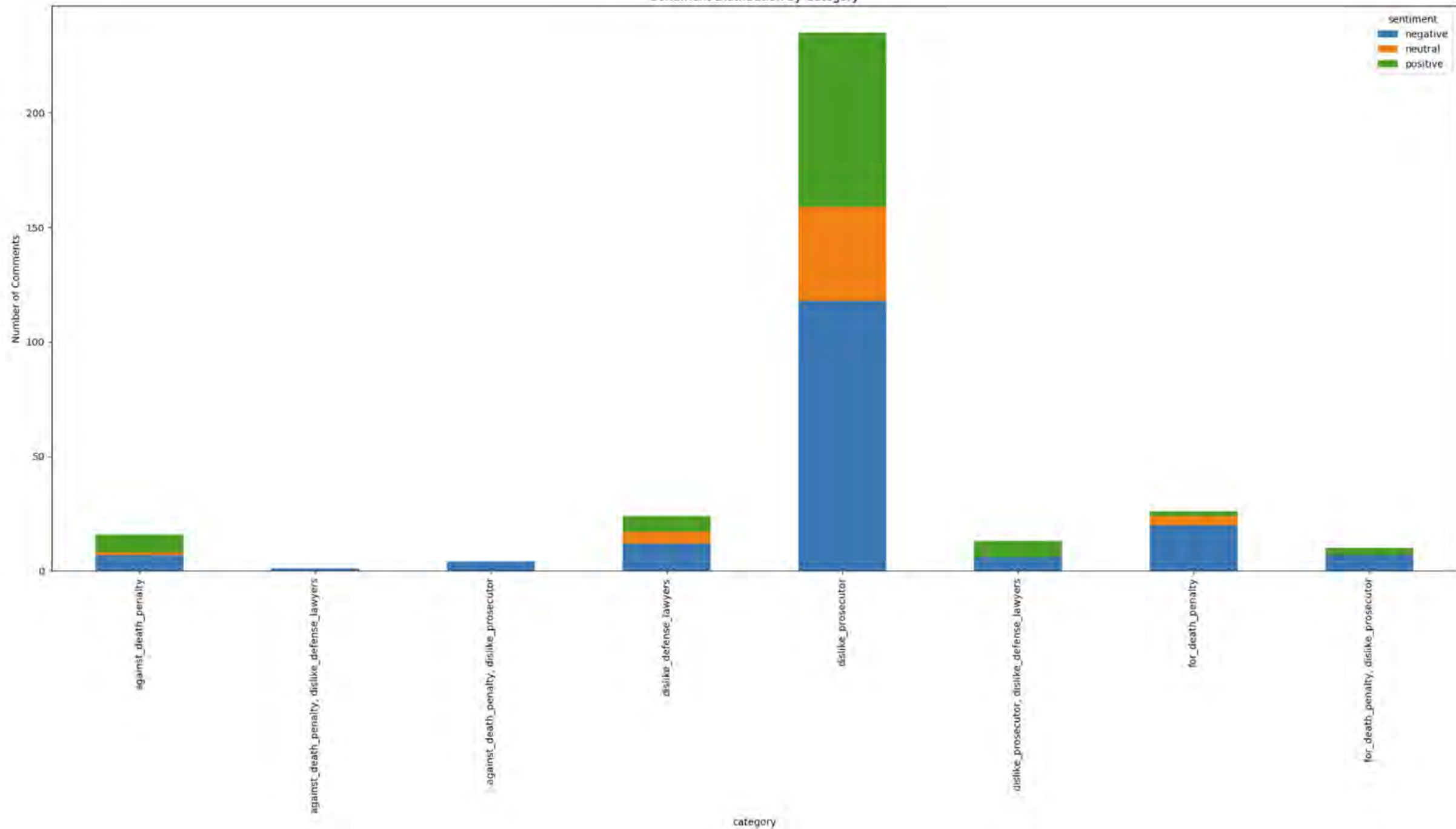
Document



KTSM Channel 9.txt

Document

Sentiment Distribution by Category





The bar chart shows the sentiment distribution across different categories related to the comments collected. Here's a breakdown of the results based on the chart:

Key Categories:

1. Dislike of Prosecutor
2. Dislike of Defense Lawyers
3. For Death Penalty
4. Against Death Penalty
5. Multiple Categories (e.g., Dislike Prosecutor and Defense Lawyers)

Interpretation:

1. Dislike of Prosecutor:

- **Largest category** by far with a significant number of comments, most of which are **negative** (blue bar).
- There's also a notable amount of **neutral** sentiment (orange) and **positive** sentiment (green), although negative sentiment clearly dominates.
- This suggests that a large portion of the community expresses dissatisfaction or frustration with the prosecutor's office, likely criticizing their handling of the case.



2. Dislike of Defense Lawyers:



Automation:

Motions Practice

New Muse, our AI model built just for fiction →

Try the AI writing tool with unparalleled story smarts.

Sudowrite is the non-judgemental AI writing partner you always wanted.

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VANITY FAIR

THE NEW YORKER

The Atlantic

The Verge

The Washington Post

WIRED



For this chat, I want you to understand the writing style of Judge David C. Guaderrama based on examples that I give you. I will provide various legal orders that he has entered. After that, I will ask you to draft motions and pleadings using his style. To start, please say GO AHEAD and I will paste examples of his writing. Keep saying GO AHEAD and I will paste new examples. When I am done I will say FINISHED. At this stage, please do not do anything except confirm that you have saved the writing style.



GO AHEAD



Defendant Brayan Calderon-Chavez moves to dismiss the criminal charges against him based on:

- (1) The Due Process Clause of the Fifth Amendment to the U.S. Constitution;
- (2) The Speedy Trial Act;
- (3) The Sixth Amendment's Speedy Trial Clause; and
- (4) The Insanity Defense Reform Act ("IDRA").¹

Although the Court is still researching and evaluating Defendant's arguments under the Speedy Trial Act, the Sixth Amendment, and IDRA, the Court has determined that Defendant's lengthy pre-hospitalization detention is a due process violation that the Court must remedy immediately.

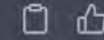
I. BACKGROUND

The Government has charged Defendant with Attempted Illegal Reentry and False Personation in Immigration Matters.² Those charges can't go forward at the moment because the Court has found Defendant incompetent to stand trial.³ Thus, in accordance with § 4241(d)(1) of IDRA (which the Court discusses in detail below),⁴ the Court issued an

advances that purpose, a nine-month period of inactivity does not.³⁴ The Court thus follows the weight of authority holding that the nine-month pre-hospitalization delay that Defendant has endured here violates the Due Process Clause.³⁵



GO AHEAD



< 5 / 5 >



The following is a legal opinion written by Judge David C. Guaderrama. Do NOT analyze it. Solely use it to learn his writing style:

Defendant Maria Guadalupe Hernandez, appearing pro se, moves to reduce her prison sentence from 188 months to 151 months. Mot., ECF No. 300, at 3.1 The Court DENIES Defendant's Motion.

I. BACKGROUND

Defendant pleaded guilty to exploiting her managerial position at the El Paso Federal Credit Union to sell fraudulent shares in the Credit Union and misappropriate the proceeds.²

When sentencing Defendant, Judge Philip Martinez imposed an "aggravating role" upward adjustment under § 3B1.1(c) of the U.S. Sentencing Guidelines, which requires a court to increase a defendant's offense level by two if she "was an organizer, leader, manager, or supervisor in [the relevant] criminal activity."³

Judge Martinez then increased Defendant's offense level by another two levels because she employed an "authentication feature" to commit her offense.⁴ Specifically, she used "the credit union's software and printer to print [fraudulent] dividend checks with magnetic-ink

*3 Because the U.S. Sentencing Commission's proposed amendments to U.S.S.G. § 4A1.1 are not yet in effect and will not necessarily be applied retroactively, the Court DENIES Defendant Ever A. Johnson's "Motion for Reconsideration" (ECF No. 91).



I've read the second example of Judge David C. Guaderrama's writing style. If you have a specific request related to this, feel free to let me know.



Please draft a motion to suppress the statement of my client, Carolina, because she was not given her proper Miranda warnings by the border patrol agent.

DRAFTING ASSISTANT

Help

Litigation

Templates and Sample Documents

Search Westlaw

Locate Authority

Quick Check

Cite Formatting

WestCheck

TOA Builder

Flags & Links

Document Formatting

Authority Compiler

Transactional

Practical Law

Support | Legal Notices

Sign Off



THOMSON REUTERS

DEFENDANT'S MOTION TO SUPPRESS STATEMENTS DUE TO VIOLATION OF MIRANDA RIGHTS¶

Defendant Carolina [Last Name], by and through her counsel, respectfully moves this Court to suppress all statements she made to border patrol agents during her detention and subsequent arrest. The Defendant contends that the statements were obtained in violation of her Fifth Amendment rights under *Miranda v. Arizona*, 384 U.S. 436 (1966).¶

I. BACKGROUND¶

On or about [Date], Carolina [Last Name] was detained by border patrol agents near [Location] while allegedly attempting to cross the U.S.-Mexico border illegally. During the detention, a border patrol agent questioned Carolina extensively about her identity, reasons for attempting to cross the border, and any involvement in criminal activities. However, at no point did the agent read Carolina her Miranda rights, as required by law before custodial interrogation. 1¶

II. DISCUSSION¶

A. Failure to Administer Miranda Warnings¶

The Supreme Court's landmark decision in *Miranda v. Arizona* established that suspects must be informed of their constitutional rights before any custodial interrogation.² In the present case, Carolina was undoubtedly in custody at the time the border patrol agent questioned her, making the Miranda warnings a requirement.³¶

1. → Custodial Interrogation¶

The agent's questions were not merely a routine booking procedure; they delved into Carolina's involvement in potentially criminal activities.⁴ The setting of her detention also indicates that

En

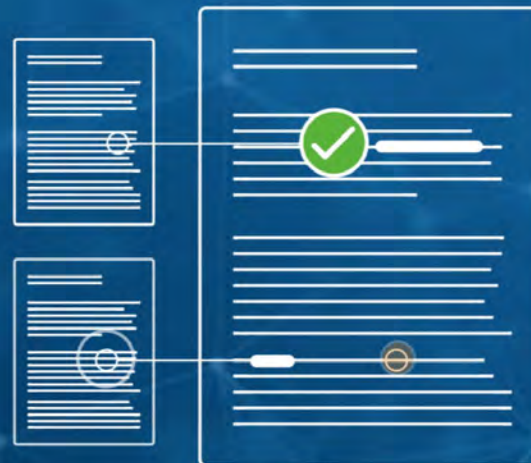
le.

← Back to start

Upload your brief or me

or drag a Micr

Identifying
relevant
citations...



Minimize

Cancel

🔒 The security and privacy of your data is important to us. We employ multiple layers of security to keep it safe. ⓘ

Start analysis

☒ Recommendations☐ Warnings for cited authority☐ Quotation analysis☐ Table of authorities

Select report ▾

Content type

Cases 7

Trial Court Orders 0

Statutes 0

Regulations 0

Secondary Sources 0

Administrative Decisions &
Guidance 0

All cited authority 7

Filter

Clear

KeyCite treatment —☐  Severely negative 0☐  Overruling risk 0☐  Negative 7

Cases (7)

Unverified citations (0)

☐ Select all items 0 items selected☐ 1. **Miranda v. Arizona**

Supreme Court of the United States • June 13, 1966 • 384 U.S. 436 • 10 Ohio Misc. 9

Depth of discussion 

- ▼ Superseded by Statute as Stated in [U.S. v. Dickerson](#) 4th Cir.(Va.) February 8, 1999
...Government's refusal to brief on appeal the question whether admissibility of confessions in federal court was governed by statute providing that confession was admissible if voluntarily given, rather than by rule of **Miranda v. Arizona** did not prevent Court of Appeals from considering such question. 18 U.S.C.A. § 3501...

 10+ yearsNegative treatment: [Most recent](#) [Distinguished \(189\)](#) [All \(265\)](#)☐ 2. **U.S. v. Craighead**

United States Court of Appeals, Ninth Circuit. • August 21, 2008 • 539 F.3d 1073 • 2008 WL 3863709

Depth of discussion 

- ▼ Declined to Follow by [U.S. v. Eaton](#) W.D.Mich. June 24, 2013
...present in this case. Lee is also distinguishable because not only is it a non-binding Ninth Circuit

 10+ years

Judges ▾

Search for judges



Hon. David C. Guaderrama

United States District Court, Western Texas

El Paso, Texas

Overview

Experience

Outcomes

Motions

Precedent

Expert challenges

Appeals

References (10,000)

 Coverage may vary. [Learn more](#)

Include multidistrict litigation



Federal

State



Filter by category

Case type



Court



Date



Ruling tendencies

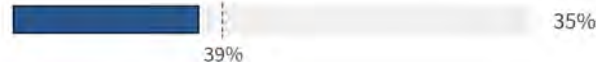
District average

Top 5 defendant filed motions

Grant rate

Total

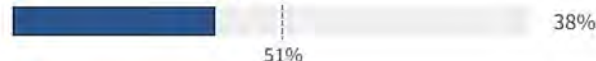
Motion to Dismiss



35%

233

Motion for Summary Judgment



38%

73

Motion in Limine



4%

23

Motion to Stay



60%

23

Motion to Compel Discovery



28%

21

Top 5 plaintiff filed motions

Grant rate

Total

Motion to Dismiss



88%

71

Motion to Remand



48%

45

Motion for Default Judgment



39%

41

Motion to Compel Discovery



17%

39

Hon. David C. Guaderrama

Senior U.S. District Judge, since May 27, 2023

United States District Court, Western Texas

Contact

Phone (915) 534-6725

Website <https://www.txwd.uscourts.gov/>

Address

525 Magoffin Avenue

El Paso, Texas 79901

El Paso County

U.S.A.

Career timeline

2010 - U.S. District Court, Western District of Texas, U.S. Magistrate Judge, 2010 - 2012

2000 - El Paso Young Lawyer's Jurist of the Year

1995 - El Paso County Two Hundred and Forty-Third District Court, Judge, 1995 - 2010

1993 - U.S. Supreme Court

1987 - El Paso County Public Defender's Office, Chief Public Defender, 1987 - 1994

Include multidistrict litigation

Search within results

Enter search terms here...

Filter by category

Motion type

+

Case type

+

Motion outcome

+

Case event

+

Filing role

+

Party

+

Attorney

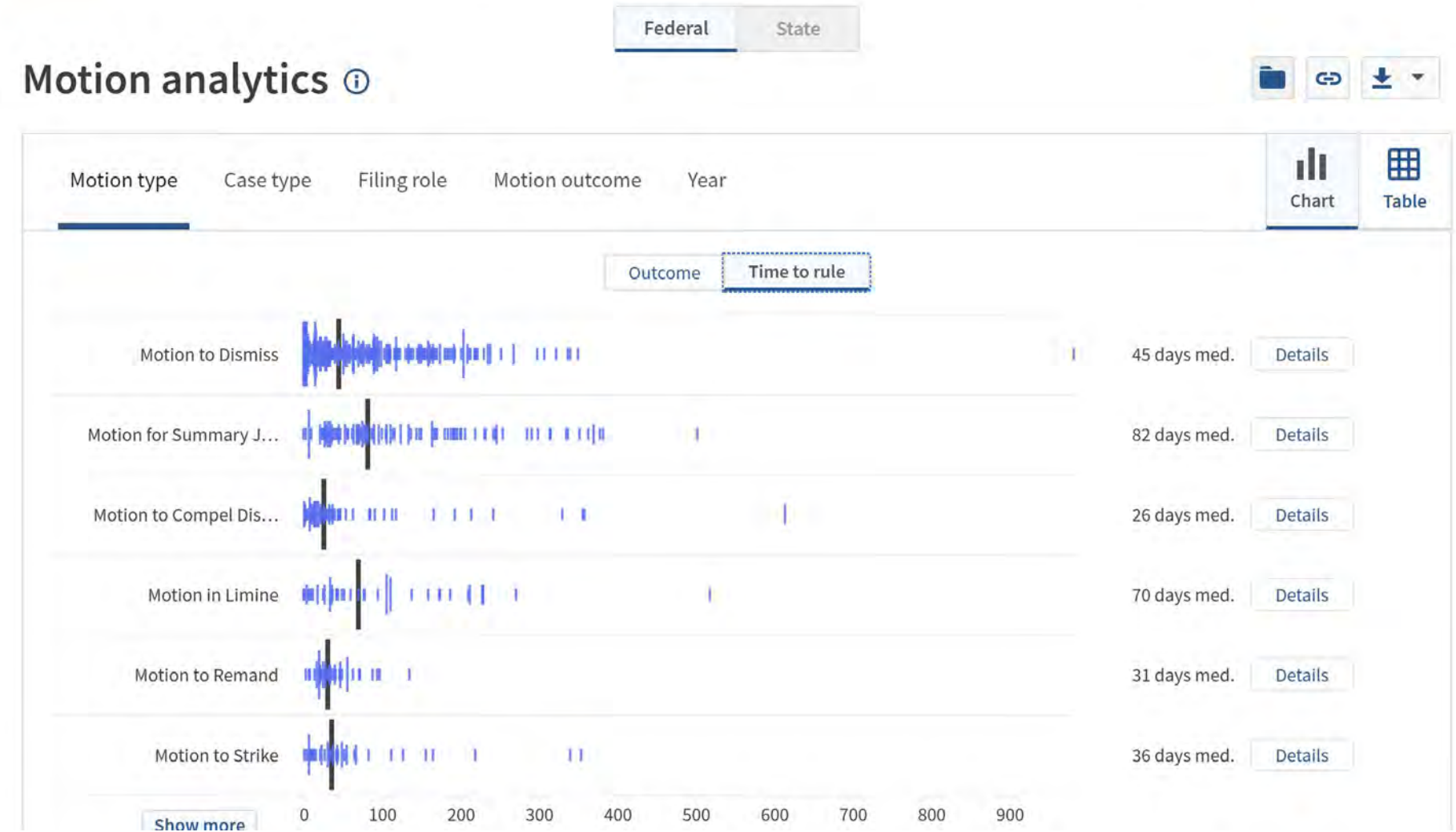
+

Filing Law firm

+

Court

+



Western District Court
Federal District Court

4 Judges
3,476 Opinions

74

Textualist

61

Traditionalist

71

Precedent

27

Policy

17

Purposivist

67

Originalist

75%

Republican

25%

Democrat

0%

Not Specified

East
Court District Court
Federal District Court

5 Judges
4,132 Opinions

-52

Textualist

-12

Precedent

-8

Purposivist

-55

Republican

0

Not Specified

74

Textualist

61

Traditionalist

71

Precedent

27

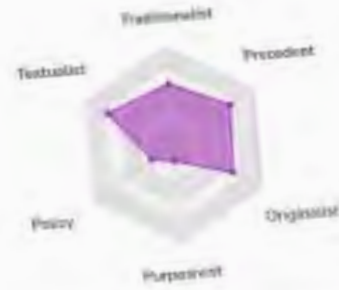
Policy

17

Purposivist

67

Originalist



22

Textualist

17

Traditionalist

59

Precedent

57

Policy

9

Purposivist

11

Originalist



41

Textualist

32

Traditionalist

68

Precedent

37

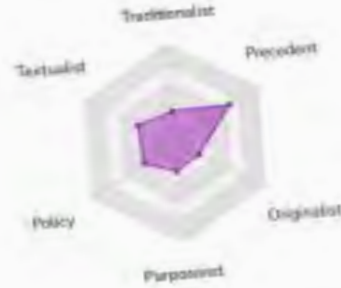
Policy

29

Purposivist

27

Originalist



Search Courts

Jurisprudence

- ☐ Textualist
- ☒ Traditionalist
- ☒ Precedent
- ☐ Policy
- ☐ Purposivist
- ☐ Originalist

Jurisdictions

- ☐ State District
- ☐ State Appellate
- ☐ State Supreme Court
- ☒ Federal District
- ☐ Federal Appellate

Political Party Registration

- ☐ Democrat
- ☐ Republican
- ☐ Independent
- ☐ Not Specified

States

add Summary

Litigation Lifecycle AI for Federal Criminal

Atticus provides AI-powered solutions for Federal law firms tackling criminal cases. With our tools, these firms can efficiently manage high caseloads and enhance outcomes for clients.

1

Loads all documents from PACER.

2

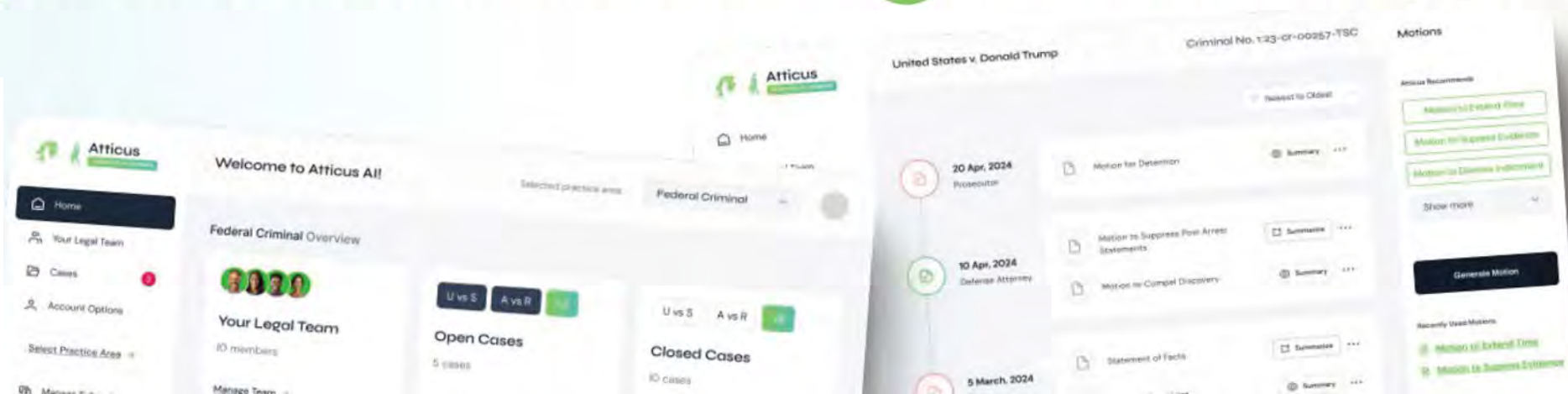
Automated summary & motion drafting tools.

3

Precedent recommendations & hallucination detection.

4

Predictive AI prosecutor & trial workflows.





Automation:

End-to-End AI Automation

AB Law Offices Client Intake Form

Please fill out the following to submit your case to our firm

Client information

What is your full name?

What is your email address?

What is your phone number? (optional)

What is your current address?

Address

City

State / Province

ZIP / Postal code

Case information

Describe what happened

Please be descriptive - e.g. a traffic accident on January 1, 2025 at Dyer and McCombs...

Did you suffer any injuries?

Documents

Please upload any relevant documents for your case

For example, images relevant to a vehicular accident, or domestic damages

Drag & drop a file or [browse](#)

AB Law Offices Client Intake Form

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City

State / Province

ZIP / P

Case information

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Did you suffer any injuries?

Documents

Please upload any relevant documents for your case

For example, images relevant to a vehicular accident, or domestic damages

Drag & drop a file or [browse](#)



- **Structured Data Capture:** Gather essential client details (mental health history, family background, prior convictions, key dates). Instant Conflict Check: Cross-reference new client and witness names with prior capital defense representations.
- **Mitigation Analysis:** Review client background and circumstances against past cases to identify potential mitigation factors.
- **Automated Task Planning:** Generate case-specific task lists and deadlines based on charges, discovery needs, and mitigation strategies.

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Did you suffer any injuries?

Documents

Please upload any relevant documents for your case

For example, images relevant to a vehicular accident, or domestic damages

Drag & drop a file or [browse](#)



- **Initial Documents:** AI drafts initial Entry of Appearance, Motion for Investigator, Mitigation Specialists, Psychologist/psychiatrist using intake data and specialized templates.
- **Case Strategy Memo:** AI summarizes case strengths, weaknesses, and identifies mitigation strategies based on client background and similar cases.
- **E-Discovery Tagging:** Sort and label discovery automatically, identifying critical mitigating evidence, inconsistencies, and prosecution errors.
- **Interview Summaries:** Provide quick AI-generated highlights emphasizing critical contradictions, mitigating statements, or impeachment points.
- **Scientific Analysis:** AI can interpret reports and results provided by prosecution and analyze their strengths and weaknesses

AB Law Offices Client Intake Form

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City

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ZIP /

Case information

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Please be descriptive - e.g. a traffic accident on January 1, 2025 at D

Did you suffer any injuries?

Documents

Please upload any relevant documents for your case

For example, images relevant to a vehicular accident, or domestic damages

Drag & drop a file or [browse](#)

NO. 100-1000000

IN THE DISTRICT COURT

IN AND FOR THE COUNTY OF DALLAS, TEXAS

Y.

LIETTE HIGGINS MATHIAS

Defendant and as Representative of

the Estate of ALFREDO DOMESTICO

Plaintiff

VS.

YMC, INC. doing business as the entity

known as YOUNG'S CANTINA AND

CELL, and YOUNG'S INVESTMENTS,

INC.

Plaintiff

Defendant

YOUNG'S CANTINA AND CELL, by and

through Defendant's attorney at law, SASH BERNARD

Case no. 100-1000000, L. 100-1000000, submitted the following

interrogatories to Defendant YMC, Inc. doing business as the entity known as Young's

Cantina and Cell, ("YMC"), individually, under the provisions of the Texas Rules of Civil

Procedure. Under the terms of said Rules, these interrogatories are to be served on the attorney

of record for Defendant YMC, Inc., within seven (7) days after service of said interrogatories on the witness date

provided by the Texas Rules of Civil Procedure. You are further notified that these

interrogatories and the answers thereto are to be used in evidence in the trial of the above

case. You are notified to clearly supplement and/or correct any answers given

interrogatories as soon as such information is known to you, your agency, or

- **Motions in Limine:** Drafted from facts + relevant case law.
- **Expert Witness Briefs:** AI compiles references to authoritative materials supporting or challenging expert credentials.
- **Trial Brief / Pretrial Order:** Auto-generated outlines referencing rules of procedure.
- **Pre-trial Timeline:** AI organizes all deadlines in a single, shareable calendar.
- **Jury Instructions:** AI drafts standard or model jury instructions, customized to your jurisdiction.
- **Opening/Closing Statements:** First-pass narrative with major themes, key evidence references.
- **Appeal Briefs:** AI can auto-generate notice of appeal, outline appellate arguments, compile relevant appellate decisions.



Automation:

Agentic AI

Operator

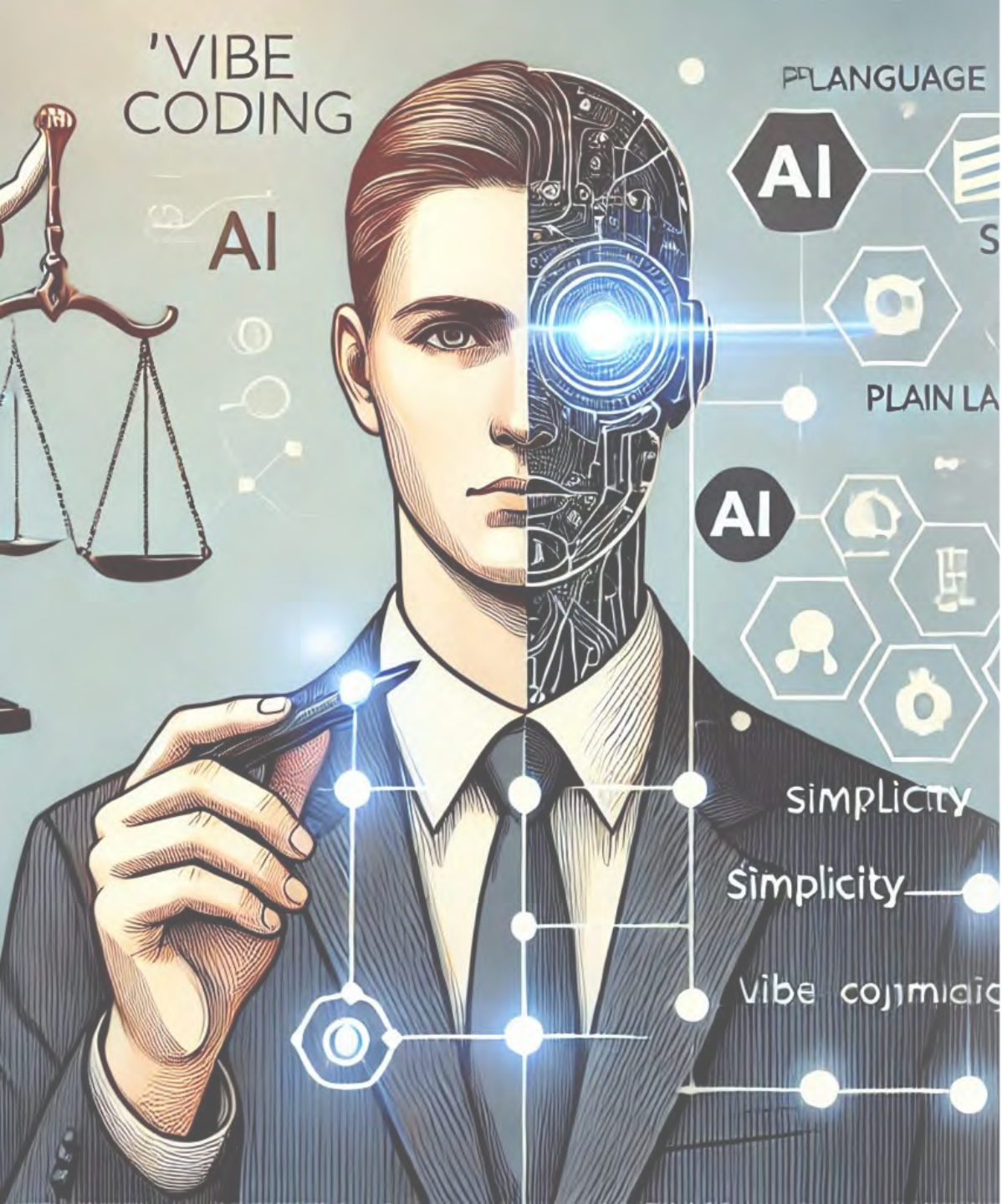
Find me the earliest non-stop Southwest Airlines flight from El Paso to Houston on February 27, 2025. Then, book a 5-star hotel in downtown Houston for that same night. Finally, reserve an SUV rental from Avis at the Houston airport





Automation:

Vibe Coding



- **Vibe Coding**
 - Customized Software Solutions
 - Fast
 - Personalized
 - Natural Language
- **Tips for Effective Vibe Coding:**
 - Clearly describe the **outcome** you want, not technical steps.
 - Provide examples (e.g., specific document names or exact data you want analyzed).
 - When you get results, test immediately and describe adjustments in plain language.
 - Iterate. Iterate. Iterate.

REFERENCE GUIDE
for the Sentencing Data Worksheet

Fiscal Years 2019-2023
(last updated August 2024)



Federal Public & Community Defenders



Excel2019-2023_08.28.2024.xlsx Properties

General

Digital Signatures

Security

Details

Previous Versions



Excel2019-2023_08.28.2024.xlsx

Type of file: Microsoft Excel Worksheet (.xlsx)

Opens with:  Excel

Change...

Location: C:\Users\felix\VLF Dropbox\Felix Valenzuela\Desktop --

Size: 176 MB (185,430,675 bytes)

Size on disk: 176 MB (185,434,112 bytes)

Created: Wednesday, August 28, 2024, 7:32:38 AM

Modified: Thursday, March 6, 2025, 12:21:33 PM

Accessed: Thursday, March 6, 2025, 12:21:33 PM

	AY	AZ	BA	BB	BC	BD	BE	BF	BG	BH	BI	BJ	BK	BL
	MNTHI	MOCO	MOHO	MOINT	MONC	MONR	MONS	MWEIG	NEWCI	NEWRA	NOCOL	NOUST	NUMD	NWSTA
1		0	0	0	8	1	0		0	3	1	2	2	21841A1
2		0	0	0	11	1	0		0	3	1	1	2	81326A
3		0	0	0	11	1	0		0	3	1	1	1	81324A1A
4		0	0	0	11	1	0		0	3	1	1	1	81324A1A
5		0	0	0	11	1	0		0	3	1	1	2	81324A1A
6		0	0	0	11	1	0		0	3	1	1	3	81324A1A
7		0	0	0	11	1	0		0	3	1	1	2	81324A1A
8	13.00	0	0	0	8	1	0		0	1	1	2	1	18922A6
9		0	0	0	4	1	0		0	3	1	1	0	81326A
10		0	0	0	4	2	0		0	2	1	2	2	18922G1
11	137.00	0	0	0	10	1	1		0	1	4	6	0	18371
12		0	0	0	4	5	0	180900.00	0	6	1	2	0	21841A1
13	6.00	0	0	0	9	1	0		0	3	1	1		81326A
14	6.00	0	0	0	9	1	0		0	3	1	1	2	81326A
15		0	0	0	9	1	0		0	3	1	1	0	18922G5A
16	6.00	0	0	0	9	1	0		0	1	1	2	0	21841A1
17		0	0	0	4	2	0		0	2	1	1	1	18924C1A
18	1.66	0	0	0	9	1	0		0	3	1	1	8	81326A
19		0	0	0	11	2	0		0	2	1	1	4	18922G1
20		0	0	0	9	1	0		0	3	1	1	4	81326A
21		0	0	0	1	2	0		0	3	1	1	0	181546A
22	17.97	0	6	0	9	1	0	140000.00	0	3	1	3	4	21846
23		0	0	0	4	2	0	201000.00	0	2	1	2	1	21841A1
24		0	0	0	9	1	0		0	3	1	1		81326A
25	7.00	0	0	0	9	1	0		0	3	1	3	1	81324A1A
26		0	0	0	4	3	0		0	6	1	1	0	182250A

- You're an experienced Python programmer who helps criminal defense attorneys analyze sentencing data and draft persuasive sentencing memos. Write a Python script that does the following clearly and simply:
- 1. Read a PDF document (the client's PSR) and extract all the text from it.
- 2. Read another PDF document (a reference guide explaining sentencing data terms) and extract all the text.
- 3. Load the excel file that has all of the federal sentences given to criminal defendants.
- 4. Ask a locally running AI model to suggest different ways to filter the sentencing database to find defendants (similar to our client) who got low sentences.
- 5. For each suggested filter:
 - Calculate the average sentence and the number of similar cases found in the database.
 - Ask the AI model again if that filter seems helpful to argue for a low sentence, based on these results.
- 6. Pick the filter that gives the lowest average sentence.
- 7. Using this best filter and the original PSR text, ask the AI to draft a persuasive sentencing memo arguing for the lowest possible sentence by comparing the client to similarly situated defendants.

```

9  # --- Configuration ---
10 LMSTUDIO_URL = "http://127.0.0.1:1234/v1/chat/completions"
11 TOKEN_LIMIT = 100000
12 MODEL_NAME = "deepseek-r1-distill-qwen-7b"
13
14 # Files
15 PSR_FILE = "psr.pdf"
16 SENTENCING_DATA_CSV = "2019-2023.csv"
17 REFERENCE_GUIDE_PDF = "reference.pdf"
18 DB_FILE = "sentencing_data.db"
19
20 # --- Helper Functions ---
21
22 def extract_text_from_pdf(pdf_path):
23     with open(pdf_path, "rb") as f:
24         reader = PyPDF2.PdfReader(f)
25         return " ".join(page.extract_text() for page in reader.pages)
26
27 def query_model(prompt):
28     response = requests.post(
29         LMSTUDIO_URL,
30         headers={"Content-Type": "application/json"},
31         json={
32             "model": MODEL_NAME,
33             "messages": [{"role": "user", "content": prompt}],
34             "max_tokens": TOKEN_LIMIT
35         }
36     )
37     if response.status_code == 200:
38         return response.json()['choices'][0]['message']['content'].strip()
39     else:
40         print(f"Model API Error: {response.status_code} - {response.text}")
41         return None
42

```

```
"iteration": 2,  
"candidate_sql": "SENSPCAP < 40 AND SENTIMP = 1 AND SEXMIN > 0",  
"aggregated_stats": {  
  "matched_rows": 17,  
  "average_sentence": 22.40529411764706  
},  
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  },  
  {  
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    "aggregated_stats": {  
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      },  
    },  
    {  
      "iteration": 6,  
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```

Concise Summary:

The iterative queries analyzed a federal sentencing database, aiming to find similarly situated defendants with minimal sentences. Initially broad queries identified numerous defendants with moderate averages (~22 months). Narrower criteria—focusing on younger defendants, specific offenses, and lower sentence limits—found smaller groups with substantially lower averages (under 10 months). Specific highly targeted queries yielded exceptionally low sentences (~0.03 months), demonstrating that careful filtering greatly improved results. However, overly restrictive conditions returned few or no matches. Thus, balancing specificity and breadth was critical in identifying optimal comparators.

Key Takeaways:

1. **Narrower conditions** (e.g., younger age, lower sentences) consistently correlated with significantly lower average sentences.
2. Defendants with sentences under **30 months**, especially aged between **25-36**, had notably lower averages (~8 months).
3. Extremely low sentences (~0.03 months) exist, demonstrating real possibilities of favorable outcomes under particular circumstances.
4. Broadening conditions increased comparators but also raised the average sentence length.

Under 18 U.S.C. § 3553(a)(6), the Court must consider avoiding unwarranted sentence disparities among similarly situated defendants. An analysis of data extracted from the U.S. Sentencing Commission's Individual Datafiles for fiscal years 2019 through 2023 indicates that defendants with characteristics comparable to this defendant—including younger age, similar offense conduct, and lower guideline ranges—regularly receive significantly lower sentences (U.S. Sent'g Comm'n, 2019-2023 Individual Offender Datafiles). Specifically, applying targeted criteria—such as defendants aged between 25 and 36, convicted of similar offenses, and subject to guideline sentence recommendations under 30 months—yielded average sentences of approximately eight months, with some defendants receiving sentences as low as time-served (approximately 0.03 months) (U.S. Sent'g Comm'n, 2019-2023 Individual Offender Datafiles).

These findings demonstrate that significantly reduced sentences are neither unprecedented nor unusual for individuals similarly situated to this defendant. While broader selection criteria within the Sentencing Commission's dataset increased the number of comparators, they also elevated average sentences, underscoring the importance of narrowly tailoring comparisons to accurately reflect the defendant's specific circumstances (U.S. Sent'g Comm'n, 2019-2023 Individual Offender Datafiles).

Accordingly, imposing a sentence consistent with the lower end of sentences identified by this targeted analysis aligns precisely with § 3553(a)'s directive to promote sentencing fairness and proportionality, effectively avoiding unwarranted disparity (U.S. Sent'g Comm'n, 2019-2023 Individual Offender Datafiles).



AI-Powered Capital Defense

Felix Valenzuela

felix@valenzuela-law.com

