



DALLKEN CONSULTING GROUP

DALLKEN CONSULTING GROUP (DCG) is an Expert Witness and Consulting Firm, created in 2009 by former Drug Enforcement Administration (DEA) Special Agent Kendal Johnson, which specializes in providing highly experienced and credible drug trafficking Expert Consulting Service and Expert Witness Testimony in Federal and State Court regarding International and Domestic Drug Trafficking, Complex Conspiracy Investigations, Criminal Enterprises and Organizations, Wiretap Investigations, and nearly all-facets of International and Domestic Complex and Simple Drug Trafficking Investigations with Subject Matter Expertise in the following areas:

- **Title III authorized Wire Intercepts (Wiretaps)**
- **Continuing Criminal Enterprise (CCE) Investigations**
- **Complex Drug Trafficking Conspiracy Investigations**
- **Continuing Criminal Enterprise (CCE) with Murder and Violence in furtherance of the Criminal Enterprise (Death Penalty)**
- **Drug-related Murder Investigations**
- **Modus Operandi of International and Domestic Drug Trafficking Organizations**
- **Manufacture, Importation, Transportation, Distribution and Money Laundering Methodologies and Techniques of International and Domestic Drug Trafficking Organizations**
- **Opioids/Opiates - Illicit Trafficking of Prescription Pain Drugs (such as Oxycontin/Oxycodone and Fentanyl)**
- **Synthetic Drugs and Analogs (Cannabinoids & Cathinones/Stimulants)**
- **Counterfeit Pills (such as Oxycontin laced w/Fentanyl)**
- **Informant Handling to include recruitment, evaluation, and control/management of Informants**
- **Search and Seizure Warrants**
- **Evidence Collection, Handling, and Management**
- **Criminal Street Gang Investigations**
- **Use of Firearms in furtherance of Drug Trafficking, Criminal Enterprises, and Racketeering**
- **Money Laundering Investigations**
- **Asset Forfeiture Investigations based on Facilitation and Drug Proceeds**
- **Surveillance Operations**
- **Management of Undercover and Informant Operations**
- **Border Drug Seizures and resulting investigation (Interdiction Cases) to include use of Blind Mules**
- **State and Local Drug Seizures and resulting investigation (Interdiction Cases) to include use of Blind Mules**
- **Interviews and interrogations**
- **Telephone Toll/Pen Register Analyses and Telephone GPS and Cell Site Data Analyses**
- **DEA Training and Investigative Policy and Procedures**
- **Controlled Delivery Operations and Reverse Sale Operations (Reversals)**
- **Law Enforcement Tactical Operations (Raids) to include Planning and Execution of Search, Arrest, and Seizure Warrants**
- **Drug & Drug Paraphernalia Identification & Availability (Methamphetamine, Cocaine, Crack Cocaine, Heroin, LSD, Marijuana (Cannabis), Ecstasy, Synthetic Drugs and Analogs, Oxycontin/Oxycodone, Fentanyl, and other controlled substances)**

With nearly 25 years of combined experience and expertise in Drug Trafficking and Wiretap Investigations and Consulting and Expert Witness Services, Kendal Johnson (since 1997), as a DEA Special Agent and current Drug Trafficking Consultant and Expert Witness, has been established and qualified as a Federal Court recognized Expert (both as a DEA Special Agent and as a Consultant/Expert Witness) and State Court (New Mexico) recognized Expert (as a DEA Special Agent) or hired privately regarding Wiretap Investigations, International and Domestic Drug Trafficking Organizations, International and Domestic Drug Trafficking Techniques, Operations, and Methodologies, Criminal Enterprises, International and Domestic Complex Conspiracy and Simple Drug Trafficking Investigations and Intelligence-Gathering, Investigation/Case Management and Supervision, and DEA Training, Guidelines, and Policy.

“Our Expert Witness and Consulting Services focus on a *Critical Thinking Approach* (underpinned by Subject Matter Expertise) to assist Clients in developing Reasoned Judgment Decisions concerning Case Strategy and Development”.

OUR CONSULTING SERVICES

- **Analysis of Case (Discovery) and Work Product Report of Findings** regarding **Wiretap Pleadings, Search Warrants, Seizure Warrants, Criminal Complaints, and other Pleadings** to determine existence of relevant **Suppression Issues** and/or other **Preliminary Matters of Importance** in the case
- **Early Case Assessment (ECA) (Discovery) and Work Product Report of Findings** to **Identify and Leverage Additional Discovery** and/or **Identify and Leverage potential Litigation Benefits and Readiness**
- **Independent Analysis of Overall Case (Discovery) and Work Product Report of Findings** to determine **Strengths, Weaknesses, False Statements, Errors, Misrepresentations, Omissions (Material), and/or False or Misleading Investigative or Prosecutorial Conclusions** as well as **Early Case Assessment (ECA)** and determination of existence of relevant **Suppression Issues** and/or other **Preliminary Matters of Importance** in the case
- **Analysis of Case (Discovery) and Work Product Report of Findings** to determine existence of **Exculpatory Evidence** and/or **Failure to Pursue or Produce Exculpatory Evidence**
- **Independent Analysis of Case (Discovery) and Work Product Report of Findings** to determine **EXACT Role, Culpability, and Exposure of the Precise Quantity(ies) of Controlled Substances attributable to Client(s)** (if any) for **Plea Negotiation Leverage and Sentencing**
- **Legal Research Guidance**
- **Comprehensive Case Strategy Improvement and Development Guidance**
- **Deposition Strategy and Preparation of Recommended Deposition Questions**
- **Opposing Expert Cross-Examination Guidance and Preparation of Recommended Questions**
- **Pre-Trial Investigation Guidance and Trial Attorney Preparation Guidance**
- **Direct Examination Questioning Guidance, Strategy, and Preparation of Recommended Questions**
- **Cross-Examination Questioning Guidance, Strategy, and Preparation of Recommended Questions for Opposing Witnesses**
- **Courtroom Observation with Ongoing Case Strategy and Development**

OUR EXPERT WITNESS SERVICES

- ◆ Expert Witness Report of Findings relative to Case Analysis involving *any* or *all* of the following:
 - Suppression Issues concerning Wiretap Affidavits, Search Warrants, Seizure Warrants, Criminal Complaints, or other Pleadings – or other Preliminary Matters of Importance to the Case
 - Strengths, Weaknesses, False Statements, Errors, Misrepresentations, Omissions (Material), and/or False or Misleading Investigative or Prosecutorial Conclusions
 - Exculpatory Evidence and/or Failure to Pursue or Produce Exculpatory Evidence
 - Exact Role, Culpability, and Exposure to Precise Quantity(ies) of Controlled Substances attributable to Client(s)
- ◆ Expert Witness Report regarding International and Domestic Drug Trafficking Matters, Methodologies, and Techniques (Modus Operandi of International and Domestic Drug Trafficking Organizations)
- ◆ Expert Witness Report regarding *other* specific Drug Trafficking Subject Matter Topics and/or Issues to be determined on a case-by-case basis
- ◆ Expert Witness Testimony in Federal Court and State Court
- ◆ Expert Witness Testimony for Depositions
- ◆ Expert Testimony (or Presentation) to Convey (in a Straightforward Manner) Case Analysis Findings, Complex Investigative Procedures and Methodologies, Modus Operandi of International and Domestic Drug Trafficking Organizations, and/or other Drug Trafficking Matters, Subjects, and Concepts to Attorneys, Attorney Firms, Judges, Jurors, additional Experts, and designated others

For more information regarding our credible and experienced **Expert Witness and Consulting Services**, visit our website at www.dallkengroup.com --- or for a free consultation or to obtain our Fee Schedule and Curriculum Vitae, contact us at the email address or telephone number below.



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*“Counsel has a duty to make reasonable investigations or to make a reasonable decision that makes particular investigations unnecessary.” **Kimmelman v. Morrison**, 477 U.S. 365, 106 S. CT 2574 (1986). However, “a decision not to investigate cannot be deemed reasonable if it is uninformed.” **Fisher v. Gibson**, 282 F. 3d 1283 (10th Cir. 2002).*