ILLINOIS STATE
BAR ASSOCIATION

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Illinois State Bar Association
High School Mock Trial Invitational
2027 Mock Trial Case

People of the State of Illinois

v.

Lane Mercer

None of the characters in this case are real. Any similarity between these characters and living people is coincidental and unintentional.

This problem was prepared and created by the Illinois Bar Association's Standing Committee on Law-Related Education for the Public.

Special thanks to ISBA staff and the ISBA's Standing Committee on Law-Related Education for the Public, and the Mock Trial Coordinator for their work in preparing the problem.

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WITNESSES

Prosecution's Witnesses	Defendant's Witnesses
Dakota Vance, Sheriff's Investigator	Lane Mercer, Stable Hand/ Defendant
S.C. Jayne, Stable Owner	Tatum Crowe, Farrier
Dr. Remy Calder, Forensic Pathologist	Dr. Finley Sloane, Forensic Pathologist

CASE DOCUMENTS

LEGAL DOCUMENTS

1. Statement of the Case
2. Grand Jury Indictment
3. Pre-Trial Order
4. Jury Instructions/ Applicable Statute
5. Affidavits
6. Exhibits

EXHIBITS

1. Whispering Pines Stables Scene Diagram
2. Crime-Scene Photograph Packet
    A. Baylee looking south through the exterior Dutch door
    B. Baylee looking north toward the interior stall door
    C. Baylee's unshod hind hoof
    D. Evidence marker showing the approximate location where Rowan Vale was found
    E. Shovel in the location where it was recovered by Investigator Dakota Vance
    F. Usual shovel-storage rack/area, showing the shovel absent
3. Shovel Photographs with Measurements
4. Forensic Laboratory Report
5. Lane Mercer 911 Call Transcript
6. Lane Mercer Interview Transcript
7. Text Message/Social-Media Packet
8. Horse Care and Temperament Records
9. Dr. Remy Calder Autopsy Report with Attached Curriculum Vitae
10. Dr. Finley Sloane Expert Report with Attached Curriculum Vitae
11. Photograph of Baylee's Stall Sign and Feeding Instructions

Statement of the Case

Rowan Vale, a successful amateur equestrian, was found dead inside the barn at Whispering Pines Stables near the stall of Baylee, Vale's unshod horse. Vale died from a single blunt-force injury to the head. Lane Mercer, a stable hand at Whispering Pines, had argued with Vale earlier that evening and was the last known person to see Vale alive. Investigators recovered a displaced stable shovel bearing Vale's blood and Mercer's fingerprints.

The State has charged Mercer with first-degree murder, alleging that Mercer killed Vale with the shovel. Mercer denies the charge and maintains that Vale died in a horse-related accident involving Baylee. The State bears the burden of proving Mercer's guilt beyond a reasonable doubt.

IN THE CIRCUIT COURT FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT
LINCOLN COUNTY,
ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS Plaintiff	VS	LANE MERCER Defendant

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General Number: 2026 CF 40892

INDICTMENT

COUNT I

The Grand Jury charges that on or about August 13, 2026, this Defendant,

LANE MERCER,

committed the offense of **FIRST DEGREE MURDER (INTENTIONAL)**

(Class M Felony)

in violation of Chapter 720, Act 5, Section 9-1(a)(1), as amended, in that this defendant, without lawful justification and with the intent to kill or do great bodily harm to Rowan Vale, struck Rowan Vale with a blunt object on or about the head, and thereby caused the death of Rowan Vale.

All of the forgoing occurring in Lincoln County, Illinois.

COUNT II

The Grand Jury charges that on or about August 13, 2026, this Defendant,

LANE MERCER,

committed the offense of **FIRST DEGREE MURDER (STRONG PROBABILITY)**

(Class M Felony)

in violation of Chapter 720, Act 5, Section 9-1(a)(2), as amended, in that this defendant without lawful justification, struck Rowan Vale with a blunt object on or about the head, and thereby causing the death of Rowan Vale, knowing that such act created a strong probability of death or great bodily harm to Rowan Vale.

All of the forgoing occurring in Lincoln County, Illinois.

A TRUE BILL
Anna Sewell
Foreperson of the Grand Jury

IN THE CIRCUIT COURT
FOR THE TWENTY-SIXTH JUDICIAL CIRCUIT
LINCOLN COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS,	)	
	)	
v.	)	26-CF-40892
LANE MERCER,	)	
	)	
Defendant.	)	

PRETRIAL ORDER

This cause having come before the Court for a pretrial conference and the Court having considered all pending pretrial motions and arguments of the parties, and the Court having been informed of various stipulations which the parties have entered into, the Court hereby enters the following PRETRIAL ORDER which shall govern the parties and their witnesses during the jury trial to be held in the above-captioned matter:

1. Lane Mercer has pleaded not guilty to both Count I and Count II and raises no affirmative defense. Defendant has invoked the privilege against self-incrimination and retains the right not to testify, as protected by paragraph 22.

2. This case is governed by the laws of the State of Illinois and the Mock Trial Rules of Evidence. The parties are bound by the law stated in the Jury Instructions and may not argue or present any statutory or case law other than what is cited in the case materials.

3. Jurisdiction, venue, and chain of custody of all evidence are proper and may not be challenged. There are no defects in the Indictment or other pleadings, Defendant has properly appeared, and all questions of fact are submitted to the jury. Questions of law shall be decided by the Court.

4. The case has been bifurcated. This trial concerns only the guilt phase. No evidence or argument that relates solely to the potential punishment or sentencing consequences faced by Defendant may be presented by either party.

5. The indictment charges first-degree murder under 720 ILCS 5/9-1(a)(1) and (a)(2). The mental states stated in the Jury Instructions are alternatives; the State need prove only one beyond a reasonable doubt to satisfy that element. The jury shall return one verdict on either Count, not separate verdicts on the alternatives. No lesser-included offense is before the jury.

6. Both parties waive all objections and motions based on the Constitution of the United States or the Constitution of the State of Illinois. Both parties also waive all objections and motions based on privilege, except for Defendant's privilege against self-incrimination. Nothing in this Order permits either party to comment adversely on the exercise of that privilege.

7. All witnesses who were questioned by law enforcement were properly advised of any applicable Miranda rights and/or voluntarily agreed to speak with law enforcement. No party may challenge the admissibility of a statement on constitutional or voluntariness grounds.

8. All case-material documents, signatures, and exhibits are authentic; authenticity objections are barred except as expressly provided here. Exhibits are pre-marked for identification, and no additional substantive exhibits may be introduced. Unless this Order provides otherwise, required foundation and other objections remain, and the parties may dispute an exhibit's meaning, weight, and associated factual or legal conclusions.

9. All photographs fairly and accurately depict their subjects. Exhibit 1 may be used as an illustrative aid at any time, without objection. It accurately depicts the general layout and expressly stated measurements but is otherwise not to scale. The shovel location marks where the investigator recovered it; no symbol identifies what caused Vale's fatal injury.

10. Immediately before trial, all witnesses reviewed their affidavits and reports, declined an opportunity to revise them, and reaffirmed their truthfulness. Affidavits were properly signed and notarized or otherwise executed under oath; expert reports were signed by their authors.

11. Witnesses were instructed to include all relevant knowledge in their sworn statements. They are bound by their affidavits and reports and may not contradict them or add substantive information, except minor background or inconsequential clarifications. A witness referencing an exhibit is familiar with the entire exhibit. Familiarity or admission does not confer personal knowledge or expertise, authorize adoption of another person's account or opinion as the witness's own, or expand permissible testimony. Examination remains subject to the Mock Trial Rules of Evidence and this Order.

12. The parties stipulate to the following facts:

    a. The incident giving rise to this case occurred on or about August 13, 2026, at Whispering Pines Stables in Lincoln County, Illinois.

    b. Rowan Vale died from a single blunt-force injury to the head.

    c. Baylee, a male thoroughbred, was one of Rowan Vale's two horses, was unshod on the date of Vale's death, and was the horse stalled nearest to where Vale was found.

    d. K.D. Jayne is S.C. Jayne's adult daughter and is not a party or designated witness. Neither party may comment on her absence. Paragraph 20 governs adverse inferences and speculation about uncalled witnesses. Admissible evidence and reasonable inferences concerning her relationships and interactions with Vale or Mercer remain permitted.

    e. Exhibit 11 depicts the sign posted at Baylee's stall at Whispering Pines Stables on August 13, 2026. "1 full scoop senior am + pm" directs one full scoop of senior feed

each morning and evening. Baylee's precise age, physical ability, and temperament are not stipulated by that instruction.

f. Exhibit 11's "1 pill am" notation and partially visible writing on papers behind the sign are outside the case. No testimony, argument, or inference may concern those portions, including the pill's identity, purpose, effects, or administration, or any medication, medical condition, treatment, or compliance with care instructions.

13. The parties also stipulate to these medical findings and limitations:

a. Vale sustained one concentrated blunt-force injury involving the side and rear portion of the head, producing a depressed skull fracture and severe injury to the underlying brain.

b. A forceful strike with the rounded handle of the recovered shovel was medically capable of producing Vale's fatal injury. The medical findings do not contain a unique patterned imprint that conclusively identifies that shovel as the source of the injury.

c. A horse kick, collision with a stall fixture, or fall onto a rounded object cannot be completely excluded by the medical findings alone.

The manner and mechanism of death remain disputed. No mechanism is stipulated to have occurred, and no relative likelihood is stipulated. The State's burden remains as stated in the Jury Instructions.

The stipulated facts in paragraphs 12 and 13 are evidence in every round without an additional witness or expert report. Either party may use them in opening statement, examination, and closing argument and may argue their significance, but may not contradict them.

14. Exhibit 4 is admissible without a laboratory analyst, technician, or physician. Either party may offer it after opening statements and before closing arguments. Its significance, timing, and weight remain disputed. Paragraph 20 governs any proposed inference from an absent laboratory witness.

15. Exhibits 5 and 6 accurately transcribe the recorded conversations:

a. If Mercer is selected as a Defense witness, Exhibit 5 is not admissible by stipulation, and any party seeking to admit it must establish its admissibility under the Mock Trial Rules of Evidence. If Mercer is not selected, Exhibit 5 is admissible by stipulation and either party may offer the exhibit into evidence at any time after opening statements and before closing arguments.

b. If Vance is selected as a prosecution witness or Mercer is selected as a Defense witness, Exhibit 6 is not admissible by stipulation, and any party seeking to admit it must establish its admissibility under the Mock Trial Rules of Evidence. If neither Vance nor Mercer is selected, Exhibit 6 is admissible by stipulation and

either party may offer the exhibit into evidence at any time after opening statements and before closing arguments.

16. Each communication in Exhibit 7 was authored, sent, received, or posted by the person identified. If Mercer is selected as a Defense witness, Exhibit 7 is not admissible by stipulation, and any party seeking to admit it must establish its admissibility under the Mock Trial Rules of Evidence. If Mercer is not selected, Exhibit 7 is admissible by stipulation and either party may offer the exhibit into evidence at any time after opening statements and before closing arguments.

17. Exhibit 8 is admissible by stipulation in every round. Either party may offer the exhibit into evidence at any time after opening statements and before closing arguments. Entries may be considered for their truth, but their accuracy and completeness, and whether they establish how the fatal injury occurred, are not stipulated. Their accuracy, context, completeness, significance, and weight remain open to challenge without inventing substantive facts. The opposing party may require contemporaneous admission of additional portions needed for fair understanding.

18. Objections to the form of the Jury Instructions and verdict form are waived. The Indictment and Statement of the Case are not evidence; the latter creates no additional stipulated facts.

19. Evidence whose relevance depends on another fact may be admitted conditionally. The proponent must later offer evidence sufficient for a reasonable jury to find that fact more likely than not. Otherwise, upon a renewed objection, the Court shall strike the conditionally admitted evidence.

20. The State shall call two of its three designated prosecution witnesses, and the Defense shall call two of its three designated defense witnesses. Before opening statements, each party shall identify its two selected witnesses to opposing counsel and the Court. Neither party may invite an adverse inference from either party's failure to call any person, speculate about an uncalled witness's testimony, or claim that witness selection conceals unfavorable testimony. An uncalled witness's affidavit is not substantive evidence merely because it is in the packet and may not be read or summarized as a substitute for live testimony.

21. Neither party may comment on the State's exercise of prosecutorial discretion in charging or declining to charge Defendant or any other person with an offense.

22. If the defense chooses not to call Defendant as a witness, no adverse inference may be drawn and neither party may comment on that decision. Defendant shall be deemed constructively present at trial wearing, by stipulation, a rather dull brown shirt with an electric green bolo necktie. No party may engage in conduct intended to mislead a witness concerning the identification of Defendant.

23. Both parties stipulate that Rowan Vale's gender is female and that she/her pronouns shall be used when referring to her for purposes of this trial.

24. All trial objections must be based on the Mock Trial Rules of Evidence contained in the Appendix to the Handbook of Rules and Procedures or on an express provision of this Order.

25. The following definitions govern the Exhibit Admissibility Chart:

    a. STIP - Admissible by Stipulation: Either party may offer the exhibit into evidence at any time after opening statements and before closing arguments. The exhibit is not automatically admitted. However, no sponsoring witness or additional foundation is required.

    b. ADMIT - Admission Required: The exhibit is not admissible by stipulation. A party seeking to introduce it must establish its admissibility under the Mock Trial Rules of Evidence.

Exhibit Admissibility Chart

	Exhibit 4	Exhibit 5	Exhibit 6	Exhibit 7	Exhibit 8
Mercer Called	STIP	ADMIT	ADMIT	ADMIT	STIP
Mercer Not Called and Vance Called	STIP	STIP	ADMIT	STIP	STIP
Neither Mercer nor Vance Called	STIP	STIP	STIP	STIP	STIP

ENTERED: *December 31, 2026*

Christina Briggs
Circuit Judge

JURY INSTRUCTIONS

Members of the jury, the evidence and arguments in this case have been completed, and I now will instruct you as to the law.

The law that applies to this case is stated in these instructions, and it is your duty to follow all of them. You must not single out certain instructions and disregard others. When I use the word "he"; in these instructions, I mean a male or a female.

It is your duty to determine the facts and to determine them only from the evidence in this case. You are to apply the law to the facts and in this way decide the case.

You are not to concern yourself with possible punishment or sentence for the offense charged during your deliberation. It is the function of the trial judge to determine the sentence should there be a verdict of guilty.

Neither sympathy nor prejudice should influence you. You should not be biased in favor or against any person because of that person's race, ethnicity, national ancestry, religion, gender, sexual orientation, age, disability, or socioeconomic status.

From time to time it has been the duty of the court to rule on the admissibility of evidence. You should not concern yourselves with the reasons for these rulings. You should disregard questions and exhibits which were withdrawn or to which objections were sustained.

Any evidence that was received for a limited purpose should not be considered by you for any other purpose.

You should disregard testimony and exhibits which the court has refused or stricken.

The evidence which you should consider consists only of the testimony of the witnesses and the exhibits and stipulations and judicially noticed facts which the court has received. You may, but are not required to, accept as conclusive any fact judicially noticed.

You should consider all the evidence in the light of your own observations and experience in life.

We all have feelings, assumptions, perceptions, fears, and stereotypes about others. Some biases we are aware of and others we might not be fully aware of, which is why they are called "implicit biases" or "unconscious biases."

Our biases often affect how we act, favorably or unfavorably, toward someone. Biases also can affect our thoughts, how we remember, what we see and hear, whom we believe or disbelieve, and how we make important decisions.

As jurors you are being asked to make important decisions in this case. You must resist jumping to conclusions based on personal likes or dislikes. You must not let bias, prejudice, or public opinion influence your decision.

Neither by these instructions nor by any ruling or remark which I have made do I mean to indicate any opinion as to the facts or as to what your verdict should be.

Faithful performance by you of your duties as jurors is vital to the administration of justice.

The Charge Against the Defendant

The defendant is charged with the offense of first-degree murder. The defendant has pleaded not guilty.

The Indictment - Not Evidence

The charge against the defendant in this case is contained in a document called the indictment. This document is the formal method of charging the defendant and placing the defendant on trial. It is not any evidence against the defendant.

Stipulated Facts

Facts the parties have stipulated must be accepted as true and considered with the other evidence. An agreement that an exhibit is authentic, accurately transcribed, or admissible does not establish the truth of every statement in it. Evaluate disputed statements and opinions under the other instructions.

Presumption of Innocence - Reasonable Doubt

The defendant is presumed to be innocent of the charge against them. This presumption remains with them throughout every stage of the trial and during your deliberations on the verdict and is not overcome unless from all the evidence in this case you are convinced beyond a reasonable doubt that the defendant is guilty. The State has the burden of proving the guilt of the defendant beyond a reasonable doubt, and this burden remains on the State throughout the case. The defendant is not required to prove their innocence.

Failure of Defendant to Testify

[Give only if Lane Mercer does not testify and the defense requests this instruction. Do not read this bracketed direction to the jury.]

The fact that the Defendant did not testify must not be considered by you in any way in arriving at your verdict.

Defendant's Statements

You have before you evidence that the defendant made statements relating to the offenses charged in the indictment. It is for you to determine whether the defendant made the statements, and, if so, what weight should be given to the statements. In determining the weight to be given to a statement, you should consider all of the circumstances under which it was made.

Circumstantial Evidence

Circumstantial evidence is the proof of facts or circumstances which give rise to a reasonable inference of other facts which tend to show the guilt or innocence of the defendant. Circumstantial evidence should be considered by you together with all the other evidence in the case in arriving at your verdict.

Definition of First Degree Murder

A person commits the offense of first-degree murder when he kills an individual without lawful justification if, in performing the acts which cause the death,

1. he intends to kill or do great bodily harm to that individual or another; or
2. he knows that such acts create a strong probability of death or great bodily harm to that individual.

Issues in First Degree Murder

To sustain the charge of First Degree Murder, the State must prove the following propositions:

First Proposition: That the defendant performed the acts which caused the death of Rowan Vale; and

Second Proposition: That when the defendant did so, he intended to kill or do great bodily harm to Rowan Vale; or he knew that his acts created a strong probability of death or great bodily harm to Rowan Vale.

If you find from your consideration of all the evidence that each one of these propositions has been proved beyond a reasonable doubt, you should find the defendant guilty.

If you find from your consideration of all the evidence that any one of these propositions has not been proved beyond a reasonable doubt, you should find the defendant not guilty.

Jury Is Sole Judge of the Believability of Witnesses

Only you are the judges of the believability of the witnesses and of the weight to be given to the testimony of each of them. In considering the testimony of any witness, you may take into account his ability and opportunity to observe, his/her age, his memory, his/her manner while testifying, any interest, bias, or prejudice he/she may have, and the reasonableness of his/her testimony considered in the light of all the evidence in the case.

[Give the following sentence only if Lane Mercer testifies. Do not read this bracketed direction to the jury.]

You should judge the testimony of the Defendant in the same manner as you judge the testimony of any other witness.

Verdict - Not Guilty

We the jury, find the defendant not guilty of first-degree murder.

_____ _____

Foreperson

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

Verdict - Guilty

We the jury, find the defendant guilty of first-degree murder.

_____ _____

Foreperson

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

APPLICABLE STATUTE

720 ILCS 5/9-1(a)(1) and (a)(2) - Relevant Excerpts

A person who kills an individual without lawful justification commits first degree murder if, in performing the acts which cause the death:

(1) he or she either intends to kill or do great bodily harm to that individual or another; or

(2) he or she knows that such acts create a strong probability of death or great bodily harm to that individual or another.

PROSECUTION WITNESS AFFIDAVIT: DAKOTA VANCE

My name is Dakota Vance. I am a sworn investigator with the Lincoln County Sheriff's Office, and this county has shaped how I do the job. I grew up near Lincolnville and have spent most of my life in this part of Illinois, where people tend to know one another, where bad news travels quickly, and where a barn light on late at night can mean anything from a sick animal to something far worse. I earned an associate degree in criminal justice from Lincoln Land Community College in Springfield before beginning my law-enforcement career.

Growing up, I spent my time outdoors hiking, fishing, and hunting. During my college summers, I also worked on my uncle's dairy farm. Looking back, he was probably doing me a favor to keep me busy and out of trouble, but he taught me invaluable lessons about animal husbandry and the realities of agricultural life. He used to tell me, "If something is worth doing once, it's worth doing right once," and "Nature don't care about your excuses - when the sun sets, unharvested corn is unharvested corn, and unfed cows are unfed cows."

I started as a patrol deputy and later moved into investigations. Most of my career has involved rural crimes, property offenses, serious assaults, and suspicious deaths. Working in Lincoln County also means spending considerable time around farms, barns, and livestock. I am not a veterinarian or horse expert, but those environments are familiar to me. Time in the woods and around farms teaches you to notice small details in your surroundings. I like to think there are things a rural deputy notices that the "city cops" might walk right past.

I took my uncle's lessons to heart in my police work. I am known for keeping incredibly detailed notes and meticulously organizing evidence. That habit comes partly from experience and partly from growing up in a place where memories can blur into stories faster than people realize. I prefer to know where an item came from, who handled it, when it was collected, and

why it matters. In an investigation like this one, I would rather have a careful record than rely on what I think I remember. A botched scene is a botched scene, and the courts don't care about your excuses.

On the night of August 13, 2026, I responded to Whispering Pines Stables after Rowan Vale was found inside the barn with a fatal head injury. Emergency personnel had already responded. By the time I arrived, the scene had the uneasy quiet that follows a sudden death in a place normally associated with routine chores, horses moving in their stalls, and people trying to finish the evening's work.

I documented the scene, arranged for the collection of blood and trace evidence, photographed relevant areas and items, and arranged for appropriate forensic testing. I also interviewed people familiar with Vale, Lane Mercer, Baylee, and the events surrounding Vale's death. As part of documenting the scene, I photographed the handwritten sign posted at Baylee's stall. The Photograph of Baylee's Stall Sign and Feeding Instructions (Exhibit 11) is that photograph. The photograph fairly and accurately shows the sign as I observed it.

The death occurred inside a working horse barn near Baylee, one of Vale's horses. From the beginning, I considered the possibility that Vale had been injured by a horse. We documented Baylee and the stall area, spoke with people familiar with Baylee, and waited for medical and forensic information. I did not arrive at Whispering Pines having already decided that Vale had been murdered.

As the investigation developed, however, several facts focused my attention on Lane Mercer.

I learned that Mercer and Vale had argued earlier that evening. Vale had been complaining about Mercer's treatment of Baylee and had threatened to have S.C. Jayne fire

Mercer. Mercer also lived at Whispering Pines as part of the job, so losing the position would have affected Mercer's housing as well.

I also learned that Mercer and Vale had both shown romantic interest in Jayne's adult daughter, K.D. Jayne. Some text messages and social-media communications suggested that Mercer was irritated by Vale's interest in K.D.

That evidence has limits. I found no explicit threat by Mercer to harm Vale because of K.D. Neither Mercer nor Vale was in an exclusive relationship with K.D., as far as I determined. Some messages that I viewed as irritation or jealousy were sarcastic or ambiguous and could be interpreted innocently. I considered them context, not proof of a crime.

The physical evidence included an ordinary stable shovel regularly used by Mercer. Mercer knew where the shovel was normally stored, but it was not in that location when I examined the area.

I recovered the shovel at the location depicted in the scene diagram and crime-scene photographs. I photographed and measured it and collected it as evidence. Mercer said the shovel had been lying near Vale and that Mercer moved it several feet while clearing space to provide aid.

Laboratory testing showed Vale's blood on the shovel handle and Mercer's fingerprints.

Mercer's fingerprints were consistent with Mercer's regular use of the shovel. That fact limited what the fingerprints could establish standing alone. But the shovel's displacement, the presence of Vale's blood, and Mercer's involvement in the events immediately preceding Vale's death required me to evaluate the physical evidence in its entirety.

The laboratory result could not establish precisely when or how Vale's blood reached the shovel. Secondary transfer was a possibility I considered. Nevertheless, finding Vale's blood on a

displaced shovel that Mercer regularly handled was significant when evaluated alongside the argument, Mercer's changing account, and the other circumstances of the investigation. I did not regard the blood evidence as conclusive by itself, but neither did I dismiss it merely because an alternative explanation was possible.

I interviewed Mercer during the investigation. Mercer initially told me that Mercer had not spoken with Vale that evening. Mercer later acknowledged that the two had spoken and had argued in the barn.

That change mattered. It was not just a minor correction to a timeline. Whether a person had recently argued with someone who was then found dead is a significant fact, and Mercer initially denied that interaction. People lie to the police for all sorts of reasons, but when the person who found the victim first denies an argument and then admits it, an investigator has to pay attention.

Mercer nevertheless cooperated in several important ways. Mercer called 911, did not flee Whispering Pines, identified the shovel, explained where it was normally stored, and explained why it had been moved. I considered those facts as well. Calling 911 did not erase the initial denial of the argument. An investigator has to weigh the cooperation alongside the physical evidence and the person's truthfulness.

No eyewitness reported seeing Mercer strike Vale. I did not witness Vale's death, and I found no witness who claimed to have seen the fatal injury occur.

I also learned that Mercer was not the only person who had difficulties with Vale. Vale had a reputation for being demanding and confrontational and for threatening consequences when dissatisfied. Other people at Whispering Pines had reasons to dislike Vale, including concerns that Vale was damaging the stable's business and reputation.

The medical evidence did not eliminate every alternative explanation either.

Dr. Remy Calder ultimately classified Vale's manner of death as homicide and concluded that the injury was more consistent with a deliberate blow from a rounded or cylindrical object. Calder considered the recovered shovel handle a medically plausible weapon.

Dr. Finley Sloane disagrees with the homicide classification. Sloane believes the medical evidence cannot reliably distinguish among a shovel strike, a hoof strike, or another blunt-force mechanism and believes the manner of death should be classified as undetermined.

I am aware of that disagreement. I am an investigator, not a forensic pathologist, and I rely on qualified medical experts for medical conclusions.

I also considered the evidence concerning Baylee. Baylee was physically capable of causing serious injury, and people familiar with Baylee described the horse as capable of becoming anxious under certain circumstances. The fact that Vale died in a working horse barn near Baylee remained relevant even after Mercer became the primary suspect.

Lincoln County is a small community, and I have spent much of my career investigating matters involving local farms and agricultural businesses. That experience helps me understand the relationships and circumstances common to rural investigations. It also reminds me that familiarity with a community is no substitute for independently evaluating evidence.

Some local defense attorneys love to accuse me of forming an early theory and then interpreting later evidence through that theory. I find the suggestion that I ignore contrary evidence insulting. Investigators do develop working theories, but those theories have to change when the evidence requires it. You have to follow where the facts lead.

In this case, my initial possibilities included a horse-related accident. I documented the horse, stall, physical evidence, and witness accounts and waited for medical and forensic results

before treating Mercer as the primary suspect. If I had simply settled on an accident and stopped looking, I could have written the whole thing off as a farm accident on night one. That is not what I did.

Vale's death attracted substantial local attention, and I knew people were watching how the Sheriff's Office handled the investigation. But public attention did not determine my conclusions. I was not interested in giving the community a particular answer; I was interested in finding the correct one. Whether the evidence ultimately supported an accident or a homicide, my responsibility was to investigate thoroughly and document what I found.

I am familiar with the Whispering Pines Stables Scene Diagram (Exhibit 1), Crime-Scene Photograph Packet (Exhibit 2), Shovel Photographs with Measurements (Exhibit 3), Forensic Laboratory Report (Exhibit 4), Lane Mercer 911 Call Transcript (Exhibit 5), Lane Mercer Interview Transcript (Exhibit 6), Text Message/Social-Media Packet (Exhibit 7), Horse Care and Temperament Records (Exhibit 8), Dr. Remy Calder Autopsy Report with attached curriculum vitae (Exhibit 9), and the photo of Baylee's Stall Sign and Feeding Instructions (Exhibit 11).

After considering the physical evidence, witness accounts, Mercer's changing statements, the circumstances surrounding the dispute, and the medical and laboratory findings, I concluded that Rowan Vale's death was a homicide and that Lane Mercer was responsible. I did not reach that conclusion lightly. I considered the possibility of an accident involving Baylee from the beginning and pursued that possibility throughout the investigation. But the evidence did not point equally in both directions. Mercer's motive, opportunity, initial dishonesty about the argument, and connection to the recovered shovel, considered alongside the medical findings, supported my conclusion that Mercer deliberately caused Vale's death. The fact that forensic medicine cannot categorically exclude every conceivable accidental cause does not mean those

explanations are equally supported by the evidence. My responsibility was to follow the evidence wherever it led, and that is precisely what I did.

Further affiant sayeth not.

Respectfully submitted,

Dakota Vance

Signed and sworn before me on November 5, 2026.

C. W. Anderson



PROSECUTION WITNESS AFFIDAVIT: S.C. JAYNE

My name is S.C. Jayne, and I am 54 years old. I am the owner and operator of Whispering Pines Stables, located just outside Lincolnville, Illinois. We board horses and provide a variety of training environments for nearly all popular equestrian events.

I started Whispering Pines Stables on property I inherited. My sibling, G.W. Jayne, inherited neighboring property where G.W. also operated a horse stable and training facility. Unfortunately, G.W. became involved with some very shady people in the horse business and eventually was arrested and sent to prison. I later acquired that property and expanded Whispering Pines.

Over the years, I acquired additional surrounding land. Whispering Pines is now the largest boarding and training facility in this region, with an indoor training barn, stables, outdoor training facilities, and paddocks. I am proud of what I built there.

I like to think people consider me a hard-working and fair businessperson, although I can be demanding. I expect my employees to do their jobs correctly and my customers to receive excellent service. Horse people can be particular. I am particular too.

My only child is my daughter, K.D. Jayne, who is 24 years old and lives in a separate house on the property. Having your adult child live on the same property sometimes means knowing more about their social life than either of you would prefer.

I hired Lane Mercer as a stable hand three, maybe four, years ago. Mercer came highly recommended by the owners of the last stable where they worked and quickly proved to be a dedicated worker who knew horses. I gave Mercer increasing responsibility until Mercer handled much of the day-to-day operation of Whispering Pines, including feeding, turnout, stalls, routine

care, and maintenance. I consider Mercer's knowledge of horses top-notch. Mercer is also generally level-headed and even-tempered, including when dealing with angry boarders.

Rowan Vale was a long-time customer who boarded two horses at Whispering Pines, including Baylee. Vale was an accomplished equestrian who took horses very seriously. We had our share of run-ins. Vale could be outspoken, demanding, confrontational, and difficult to satisfy. Oddly enough, I sometimes admire those qualities, although with Vale they could become exhausting.

Baylee was generally manageable, but I knew Baylee could become skittish or anxious when cornered or approached suddenly inside a stall. I did not consider Baylee vicious or uncontrollable, but even a manageable horse can react badly when frightened in a confined space. I recognize the sign shown in the Photograph of Baylee's Stall Sign and Feeding Instructions (Exhibit 11). I was familiar with that sign from operating Whispering Pines, and it was posted at Baylee's stall on the date Vale died. It identified Baylee's care instructions, including one full scoop of senior feed in the morning and one full scoop in the evening.

I knew both Vale and Mercer had taken a romantic interest in K.D. and sometimes sensed tension between them about it. Neither was in an exclusive relationship with K.D. as far as I knew. K.D. was an adult, and I had no intention of refereeing the situation.

I personally saw Vale shout at Mercer more than once about the care or handling of Vale's horses. Mercer generally remained calm, and I never saw Mercer become physically aggressive toward Vale.

In the weeks before Vale died, Vale repeatedly complained that Mercer was not properly caring for Vale's horses, particularly Baylee. That surprised me because I had seen Mercer do

excellent work. Vale eventually had the audacity to tell me I should fire Mercer. I did not appreciate being told how to run my operation.

I could not simply ignore Vale, however. Vale boarded two valuable horses with me and had considerable influence in the equestrian community. Vale eventually told me that Vale intended to remove both horses and encourage other boarders to leave Whispering Pines if the situation was not resolved. I also heard through the grapevine that Vale was telling customers their horses were not being properly cared for. That was ridiculous, and I was angry about it.

I complained about the situation to people when I was in town on business and made no secret that the disputes were putting Whispering Pines' business and reputation at risk. Losing Vale's horses would cost money; losing other boarders or damaging the reputation of the operation I had spent years building could cost considerably more.

At the same time, losing Mercer would have been a major headache. I relied heavily on Mercer to operate Whispering Pines, and replacing someone who already knew the property, horses, owners, and daily routine would have been expensive and disruptive.

Shortly before Vale died, I pulled Mercer aside and told them about Vale's complaints and demand that I fire them. Mercer lived on the property as part of the job, so we both knew being fired would mean losing a home as well as employment. I told Mercer I had no present intention of being bullied into firing one of my key employees.

I also told Mercer that Vale intended to remove both horses, was encouraging other owners to leave, and intended to continue pressing me about Mercer's employment. I made clear that Vale's business and goodwill were important. When Vale died, the dispute remained unresolved, and Mercer knew it.

On the day Vale died, I told Mercer that Vale would be coming to Whispering Pines. Mercer appeared calm and did not seem bothered about having to interact with Vale.

I was on the property all day, mostly doing paperwork and making calls from my office in the main house, which is across the property from the barn where Vale was later found. I heard no shouting, argument, or physical confrontation, although the distance means I cannot say none occurred.

Shortly before Vale was found, I happened to see Vale enter the barn area where Baylee was stalled and Mercer was working. I expected Vale and Mercer would interact about Baylee and the unresolved employment dispute. I was not continuously watching the barn entrances, however, and cannot say who else may have entered or left. I later learned that Vale had suffered a fatal injury there.

I know the shovel investigators recovered. It was an ordinary stable shovel Mercer regularly used, and Mercer knew where it was ordinarily stored. There was nothing unusual about Mercer having handled it during normal work.

I am familiar with the Whispering Pines Stables Scene Diagram (Exhibit 1), Crime-Scene Photograph Packet (Exhibit 2), Shovel Photographs with Measurements (Exhibit 3), Text Message/Social-Media Packet (Exhibit 7), Horse Care and Temperament Records (Exhibit 8), Lane Mercer Interview Transcript (Exhibit 6), and the Photograph of Baylee's Stall Sign and Feeding Instructions (Exhibit 11). The horse records are generally consistent with my experience that Baylee could become anxious under certain circumstances but was not an animal I considered so dangerous that Baylee needed to be removed from the stable.

I do not know what happened inside that barn when Rowan Vale received the fatal injury. I did not see anyone strike Vale, and I did not see Baylee injure Vale. What I can say is what I

personally knew about Vale, Mercer, Baylee, Whispering Pines, and the dispute that remained unresolved when Vale entered that barn.

Further affiant sayeth not.

Respectfully submitted,

S.C. Jayne

Signed and sworn before me on November 10, 2026.

Walter Farley



PROSECUTION WITNESS AFFIDAVIT: DR. REMY CALDER

My name is Dr. Remy Calder. I am a board-certified forensic pathologist employed by the regional medical examiner's office serving Lincoln County and several surrounding counties. I have spent most of my professional life examining people who can no longer tell us what happened to them. It is grim work, but it is exacting work, and I have devoted my career to doing it with uncommon care. My responsibility is to make the physical evidence speak as clearly as science permits- and to recognize, with equal precision, where science requires restraint.

I earned my undergraduate degree in biology from the University of Illinois Urbana-Champaign and my medical degree from the University of Illinois College of Medicine. I then completed residency training in pathology at Northwestern Memorial Hospital in Chicago, followed by specialized fellowship training in forensic pathology in Illinois. Since completing that training, I have performed hundreds of autopsies involving suspected homicides, accidents, suicides, and deaths in which the manner was initially unclear. I am board-certified in forensic pathology—a credential earned through demanding training and examination, not honorary punctuation after one's name. My complete education, training, certifications, and professional experience are contained in my curriculum vitae, which is attached to my autopsy report and speaks for itself in considerable detail.

I also occasionally teach continuing-education courses for law-enforcement officers, medical professionals, and investigators. I do so because sound forensic practice depends on disciplined reasoning, and because experience is most useful when one is capable of explaining it clearly to other professionals.

I have developed a reputation for being somewhat precise about language. I do not regard that as a character flaw, although several coworkers disagree. In one of my law-enforcement

courses, I spent nearly ten minutes explaining that calling something a “prop gun” does not make its injuries any less real if it is capable of firing a projectile. Apparently that lecture became memorable for reasons having nothing to do with medicine. Our office also has an unofficial rule against unlabeled frosted brownies at staff potlucks. I did not create that rule, but I support it.

Despite those occupational hazards, I like my work, and I know it well. I separate what the medical evidence establishes, what it supports, and what remains merely possible but less likely. Those categories are not interchangeable, and I do not blur them for convenience.

I personally performed the autopsy of Rowan Vale and examined Vale’s body before burial. My findings and conclusions are documented in my autopsy report. I am familiar with that report and the attached curriculum vitae (Exhibit 9), the Crime-Scene Photograph Packet (Exhibit 2), the Shovel Photographs with Measurements (Exhibit 3), the Forensic Laboratory Report (Exhibit 4), and Dr. Finley Sloane’s report and curriculum vitae (Exhibit 10).

Between the autopsy itself and my subsequent review of the laboratory findings, photographs, medical records, investigative materials, and shovel measurements, I spent approximately 11 hours examining and evaluating Vale’s death.

In evaluating a blunt-force injury, I follow the same methodology I use in my ordinary forensic-pathology practice - a methodology refined across hundreds of examinations and sufficiently rigorous to withstand scrutiny rather than merely sound impressive in a report. I consider the location and shape of the injury, how concentrated or distributed the force appears to have been, the resulting fracture pattern, associated injuries, and any patterned or trace evidence. I then compare those findings with medically recognized mechanisms capable of producing them and test reasonable alternatives against the complete record. These methods are routinely used, taught, and generally accepted in forensic pathology. I did not need a novel or experimental

technique to reach my opinions in this case; the established tools of the discipline, properly applied, were more than adequate.

Vale died from severe blunt-force trauma to the head. The evidence on that point is unequivocal. One principal, concentrated area of injury involved the side and rear portion of the head, producing a depressed skull fracture and devastating injury to the underlying brain. In plain English, substantial force drove part of the skull inward. This was not a marginal or ambiguous injury; it was catastrophic and fatal.

In my professional opinion, the fatal injury is substantially more consistent with a forceful strike by a rounded or cylindrical object than with an ordinary fall onto a flat surface. A typical fall onto a flat barn floor distributes force differently. Vale's injury was distinctly concentrated, and its fracture pattern is medically significant. It does not become less so merely because counsel or another expert can imagine an alternative scenario.

As part of my work, I reviewed photographs and measurements of the stable shovel recovered during the investigation. Its handle is rounded and cylindrical, and its general diameter and curvature are compatible with the dimensions and configuration of Vale's fatal injury. I therefore concluded, without hesitation, that the shovel handle is a "medically plausible weapon." That is a measured medical conclusion, not a casual possibility.

I want to be precise about that phrase, because precision is not pedantry when a person's death is at issue. "Medically plausible" does not mean "scientifically identified." I cannot state to a reasonable degree of medical certainty that this particular shovel, or any other particular object, was the object that struck Vale. The wound does not contain a unique patterned imprint that conclusively matches the shovel handle. A lesser analysis might glide past that distinction; mine does not.

Similarly, I did not find wood fibers, splinters, paint, or other material from the shovel handle embedded in Vale's wound. That does not exclude the shovel, but it provides no trace evidence independently tying the shovel to the fatal blow.

I am aware from the Forensic Laboratory Report that Vale's blood was found on the shovel handle. That is relevant evidence, but blood on an object and the medical cause of an injury are separate questions. Blood can result from direct impact or secondary transfer, including movement of the object or an attempted rescue. The presence of Vale's blood on the shovel therefore establishes contact with Vale's blood; it does not, standing alone, establish that the shovel caused the fatal injury.

I found no recognizable horseshoe pattern, hoof-shaped bruising, horsehair, manure, soil, hoof debris, or similar material associated with the fatal wound. However, Baylee was unshod, and an unshod hoof can produce broad or irregular blunt-force trauma without leaving a recognizable horseshoe mark. The absence of such a mark does not eliminate a horse kick.

I am a physician and forensic pathologist, not a veterinarian, and I have no specialized training in equine anatomy, horse behavior, or the biomechanics of horse kicks. Competent experts know the boundaries of their disciplines; confident ones state those boundaries plainly rather than pretending they do not exist.

From a medical standpoint, the location of the fatal injury is highly significant. A horse kick causing this particular injury would have required the hoof to strike the side and rear of Vale's head with significant, fairly concentrated force under a comparatively precise set of circumstances. By contrast, a person positioned behind or beside Vale could readily deliver a blow to that same location with a rounded object. The medical evidence does not treat those scenarios as equally persuasive, and neither do I.

Vale had other abrasions and bruises, but they were comparatively minor. In my opinion, those injuries are most consistent with Vale collapsing and contacting the floor, wall, or surrounding structures after sustaining the fatal head injury. I did not find the broader pattern of extensive trauma that I would ordinarily expect if Vale had been trampled, repeatedly kicked, or violently thrown around the stall.

I cannot completely exclude a horse kick, collision with a stall fixture, or fall onto a rounded object as the cause of the fatal injury. Forensic medicine rarely rewards absolute language where the evidence does not justify it. But those mechanisms are materially less consistent with the total medical evidence than a deliberate blow delivered with a rounded or cylindrical object.

Vale did not have significant defensive injuries. That is consistent with a surprise assault, but also with an unexpected horse-related accident, so the absence of defensive injuries does not conclusively distinguish between the two.

When I initially completed the autopsy, I did not immediately classify Vale's manner of death as homicide. I classified the manner as pending while I awaited additional scene and investigative information. A pending classification is routine and consistent with generally accepted forensic-pathology practice when additional scene or investigative information is necessary to determine the manner of death.

The cause of death, the severe blunt-force injury to Vale's head, was clear. The manner of death required additional information concerning how that injury occurred.

While the case was pending, I reviewed additional investigative materials, including the crime-scene photographs, information gathered by Investigator Dakota Vance, the available medical records, the laboratory findings, and the photographs and measurements of the shovel. Considering that type of scene and investigative information together with the autopsy findings

is part of the ordinary methodology used in determining manner of death. Investigator Vance provided investigative information but did not instruct me how to classify the death.

After reviewing the additional information together with my autopsy findings, I classified Vale's manner of death as homicide. I did so because the totality of the evidence points decisively and more convincingly to another person deliberately inflicting the fatal blow than to an accidental horse-related injury or ordinary fall. I also concluded that the shovel handle recovered from the stable was a medically plausible instrument for producing the fatal injury. These are not tentative impressions. They are my independent professional conclusions, reached by accepted forensic methods, and I stand behind them.

Dr. Finley Sloane reaches a different ultimate manner-of-death determination. I have reviewed Dr. Sloane's report and curriculum vitae, and I recognize Dr. Sloane as a qualified forensic pathologist. We rely on the same generally accepted principles of forensic pathology. The difference is that, when those principles are applied to the complete record in this case, I find the evidence supporting homicide more coherent, more persuasive, and more compelling.

Dr. Sloane and I agree that a horse kick is medically possible and that the medical findings alone cannot conclusively distinguish an intentional blow from every conceivable horse-related accident. But identifying a possible alternative is only the beginning of the analysis; the decisive question is which explanation best accounts for the complete evidentiary record. On that question, my conclusion is firm. The concentrated nature and location of the fatal injury, the absence of more extensive trauma, the compatibility of the shovel handle with the wound, and the investigative circumstances align more fully and more convincingly with homicide. Considered together, that evidence does not merely permit my conclusion - it strongly supports it.

My homicide determination depends partly upon witness statements and other information obtained during the investigation, including information from Investigator Vance. The autopsy alone established the fatal blunt-force head injury but could not conclusively determine whether Vale was intentionally struck or injured in an unusual horse-related accident.

That limitation does not weaken my opinion; it demonstrates that the opinion has been calibrated rather than embellished. After considering the autopsy findings together with the complete information available to me, I remain firmly of the opinion that the manner of Vale's death is homicide. The recovered shovel is compatible with the injury and is a medically plausible weapon, although the evidence does not permit me to identify it as the weapon to a reasonable degree of medical certainty. I will not overstate what the evidence proves. I have no need to. Nor will I understate it for the comfort of those who prefer ambiguity.

In forensic medicine, qualification is not weakness; it is discipline. I know the difference between a conclusion supported by evidence and a claim dressed up as certainty, and I have built my career on maintaining that distinction with more rigor than flourish - although I am fully capable of both. My conclusions here are deliberate, methodical, and professionally grounded. They are the product of specialized training, substantial experience, and an analysis I expect to withstand serious scrutiny. I state them with exactly the confidence the evidence warrants - no more, no less, and without apology.

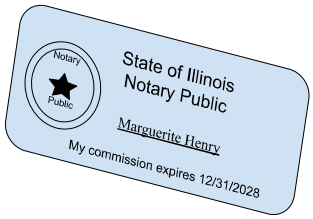
Further affiant sayeth not.

Respectfully submitted,

Dr. Calder

Signed and sworn before me on November 3, 2026.

Marguerite Henry



DEFENSE WITNESS AFFIDAVIT: LANE MERCER

My name is Lane Mercer. I work as a stable hand at Whispering Pines Stables, and I live in housing provided with the job. Work and home are the same address. I have worked around horses for most of my life. Feeding, turnout, cleaning stalls, fixing things, handling difficult horses. Most of what I know came from doing those things and listening when somebody with more experience told me I was doing something wrong. You correct the thing that is wrong. Then you go back to work.

Horses have always made more sense to me than people. I have worked with calm horses, nervous horses, stubborn horses, and a few that seemed determined to shorten my life. I have seen horses kick, rear, bolt, and injure people with little warning. A horse can stand half asleep one second and move a thousand pounds of animal the next. The weight was there the whole time. People forget that when an animal is standing still. You learn not to assume that because a horse was calm five minutes ago, it will still be calm five minutes later.

I am a pretty private person. I do not spend much time online, and I am not especially interested in whatever everybody else is talking about. Somebody once mentioned “PartyMist” to me. I thought it was fly spray. That seemed a reasonable name for fly spray. I do stop at the Sawtooth Gas Station for coffee before early barn mornings. The coffee is not particularly good, but at four-thirty in the morning “hot” and “good” are close enough. I am buying something to keep me awake. It does that.

At Whispering Pines, I handle much of the daily care of the boarded horses. I feed, turn horses out, clean stalls, move hay and bedding, make minor repairs, and watch for problems. Horses still need feeding when people are having a difficult day. That is one of the things I like about the work. Rowan Vale boarded two horses there, including Baylee. I recognize the sign

shown in the Photograph of Baylee's Stall Sign and Feeding Instructions (Exhibit 11). It was posted at Baylee's stall before Vale died and was there on August 13, 2026. I was familiar with it through my work caring for Baylee.

Vale cared deeply about the horses and had strong opinions about how they should be handled. Baylee could become anxious when cornered or approached suddenly inside a stall. I knew that from working with Baylee. That did not make Baylee a bad horse. "Bad" is something people say when they want an animal's behavior to be about them. A frightened horse can hurt someone whether it means to or not. The injury does not wait for you to settle the question of intention.

Vale and I had disagreed about Baylee before. Shortly before Vale died, Vale accused me of mishandling Baylee and said Vale intended to demand that S.C. Jayne fire me. I disagreed with the accusation, and I was angry about it. I can say that plainly. Angry.

The threat to my job mattered. Whispering Pines was not just where I worked. It was where I lived. Losing the job would have meant losing my paycheck, my housing, and most of my daily contact with the horses I cared for. Those were separate losses attached to the same decision. I am not going to pretend that did not bother me. It did.

There was also an issue involving S.C. Jayne's adult daughter. I was interested in her, and I knew Vale was interested in her too. Neither Vale nor I was in an exclusive relationship with her. I made some irritated and sarcastic comments about Vale's attention toward her. Looking back, I wish I had kept those thoughts to myself. Written sarcasm stays exactly where you leave it. The irritation can pass. The words are still there. But I never threatened Vale over her, and I never threatened to kill or physically harm Vale.

On the evening Vale died, Vale came into the barn while I was working. We argued about

Baylee, and Vale again raised the issue of having me fired. Vale and I were alone in the barn for at least part of that time. As far as I know, I was the last person known to have seen Vale alive before the fatal injury. I understand how that sentence sounds. It is still the sentence I have to give you.

After the argument ended, I went back to my work. I did not look at a clock, so I cannot account precisely for every minute between the argument and my 911 call. I know some time passed. Then I heard a loud impact from the stall area and heard Baylee moving violently. An impact. Movement. Those are sounds I remember, not a view of what happened.

I went toward the noise and found Vale on the floor. Baylee was agitated. The stall door was partly open, and equipment near the wall had been disturbed. I did not see Baylee kick Vale. What I can say is what I heard immediately beforehand and what I saw when I arrived. I cannot put myself there a moment earlier just because that would make the account more complete.

My first thought was that Vale was badly hurt. I checked for signs of life and tried to help. There was blood, and I got blood on my hands and clothing while touching Vale and attempting to provide aid. I called 911 and followed the dispatcher’s instructions until emergency personnel arrived. There were things to do. I tried to do them.

There were items around Vale, including a shovel. I moved the shovel several feet and moved other nearby things while clearing space around Vale. I understand now that doing that changed the condition of the area before law enforcement arrived. At the time, I was not thinking about preserving a crime scene. I was trying to help a person lying on a barn floor. The shovel was in the space I needed. I moved it out of that space. That is what I was thinking about then.

I regularly used that shovel in my work, and it was normally stored in an area I used and controlled. I told investigators that myself. I understand that my fingerprints were found on the

handle. I would expect my fingerprints to be on a tool I routinely handled. A handle is the part you put your hand around.

I also understand that Vale's blood was found on the shovel handle. I cannot say exactly how it got there. The shovel was near Vale. Vale was bleeding. I moved the shovel while trying to clear room around Vale. Those are the things I know. I cannot make them tell me the exact moment the blood reached the handle. I did not strike Vale with it.

By the time emergency responders arrived, Baylee was relatively calm. That does not change what I saw earlier. When I first reached the stall area, Baylee was agitated and had been moving violently. Horses can calm down. They do not remain in one emotional state simply because somebody later arrives and sees them differently. Baylee was not keeping a condition on display for the next person through the door.

I stayed at Whispering Pines after calling 911. I did not run away, hide from investigators, or refuse to speak to law enforcement. When investigators asked about the shovel, I identified it and explained where it was normally kept. I also allowed investigators to search my work area and living quarters. Where I worked. Where I slept. I permitted both searches.

There is one thing I handled badly when Investigator Dakota Vance first questioned me. I initially said I had not spoken with Vale that evening. That was not true. We had argued. It was a lie. I do not need a more comfortable word for it.

I was scared. Vale was dead, I had found Vale, and I knew we had just had an argument about my job. I knew exactly how that would sound. So I tried to avoid talking about the argument. It was a mistake. I later admitted to Investigator Vance that Vale and I had argued, and my interview transcript reflects that. Both answers are there now. The false one and the correction. I understand that you can read both.

I understand why that first answer looks bad. I should have told the truth immediately. But being afraid to admit that I had argued with somebody who was later found dead is not the same thing as killing that person. I lied about a conversation. I did not kill the person I had it with.

I also cannot provide a precise account for the several minutes between the end of our argument and my 911 call. I was doing barn work, not keeping a written timeline. I remember the argument ending, returning to what I was doing, hearing a loud impact and Baylee moving violently, and then finding Vale on the floor. I can give you that sequence. I cannot give you a minute hand I did not look at.

I have enough experience around horses to know what a kick can do. A horse can react suddenly when frightened, crowded, or cornered. Baylee was known to become anxious in those situations. When I found Vale, Baylee was agitated, the stall door was partly open, and equipment had been disturbed. Those circumstances are why I believe a horse-related accident occurred. That belief comes from the horse and the room as I found them.

Again, I did not see Baylee kick Vale. I am not claiming I did. But no witness saw me strike Vale either. Nobody saw me use the shovel as a weapon, and nobody heard me threaten to kill or physically harm Vale. I am being exact about what I saw and what I did not see. I want the same exactness when people describe what they say I did.

I am familiar with the Whispering Pines Stables Scene Diagram (Exhibit 1) and the Crime-Scene Photograph Packet (Exhibit 2). I am also familiar with the Shovel Photographs with Measurements (Exhibit 3) and the Forensic Laboratory Report (Exhibit 4). I am also familiar with the Photograph of Baylee's Stall Sign and Feeding Instructions (Exhibit 11). I recognize the shovel shown in the Shovel Photographs with Measurements (Exhibit 3) as one of the ordinary

tools used around the stable.

I am familiar with the Lane Mercer 911 Call Transcript (Exhibit 5) and the Lane Mercer Interview Transcript (Exhibit 6). I have also reviewed the Horse Care and Temperament Records (Exhibit 8) concerning Baylee and the Text Message/Social-Media Packet (Exhibit 7). Some of the communications in the Text Message/Social-Media Packet (Exhibit 7) show that I was irritated with Vale. I was irritated. I am not going to pretend otherwise simply because Vale later died. Death does not make an earlier feeling disappear. It changes what people do with it afterward.

I wish I had admitted the argument the first time Investigator Vance asked. I wish I had looked at a clock so I could account for every minute. I wish I had not moved the shovel before law enforcement arrived. Those things would make this easier to explain now. I can identify each of those mistakes. I cannot go back and remove one.

But I did not flee. I called 911. I tried to help Vale. I remained at Whispering Pines. I cooperated with investigators, identified the shovel, and permitted the searches. Those things happened too. They belong in the account.

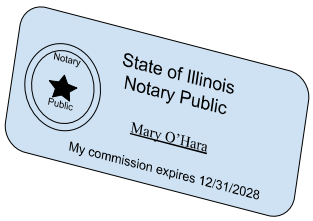
I did not kill Rowan Vale. I did not strike Vale with the shovel or with anything else. I have maintained from the beginning, and still believe, that Vale's death was a tragic horse-related accident. I cannot make that answer different by making it longer.

Further affiant sayeth not.

Respectfully submitted,

Lane Mercer

Signed and sworn before me on
November 20, 2026.
Mary O'Hara



DEFENSE WITNESS AFFIDAVIT: TATUM CROWE

My name is Tatum Crowe, and I am 42 years old. I was born in Hayward, Wisconsin, but my parents moved our family to Lincoln County, Illinois when I was just a baby to get away from the northern Wisconsin winters. Other than a four-year stint in the Navy, I have lived in Lincoln County for essentially my entire life. I now live in rural Lincoln County with my partner, Ash, and our Husky/Shepherd mix, Shaw.

After I got out of the Navy, I was not entirely sure what I wanted to do with my life. As luck would have it, a local stable was hiring, so I put my name in the hat and got the job. I ended up working as a stable hand for years and learned to love horses. I did just about everything: feeding and watering horses, mucking stalls, brushing them down after rides, fixing fences, holding horses for veterinarians, and keeping an eye out for anything unusual in their behavior or condition. It was the usual glamorous stable work, including figuring out which horse had broken something before breakfast.

While working around horses, I completed substantial coursework in Parkland College's Veterinary Technology program in Champaign, Illinois. My coursework included animal anatomy, basic injury assessment, and animal behavior, including horse behavior. The program included hands-on veterinary training, and I had exposure to large-animal care. I never completed the program or took the examination necessary to become credentialed, so I am not and have never been a licensed or credentialed veterinary technician.

After many years working as a stable hand, I saved enough money to start my own farrier business. A farrier is someone who trims and balances horses' hooves and, when appropriate, fits and applies horseshoes. It is a physical job. You spend a great deal of time bent over underneath animals that outweigh you by several hundred pounds, so you have to stay in decent shape and

pay attention if you want to avoid hurting yourself or the horse.

There can also be pressure because people put a lot of money into some of these horses. Fortunately, horses generally do not care what their purchase price was. They will step on a $200 pair of boots just as happily as a $20 pair.

I eventually bought two horses of my own, Fanny and Flowerpot. They are boarded at Whispering Pines Stables. I also provide hoof care to horses throughout Lincoln County and regularly work at Whispering Pines, including providing hoof care to Baylee.

Working safely as a farrier requires learning to read horses. I watch posture, ears, hindquarters, tension, movement, and how a horse reacts to people and the space around it. You learn quickly that the safest horse in the county can become a very different animal if it feels trapped.

I have known Lane Mercer professionally for years. Lane and I are friendly, but we are not especially close outside the horse world.

I have also learned that horse people can argue about almost anything. Bits. Blankets. Feed. Whether a horse is “spooky” or merely “sensitive.” I once listened to two people argue long enough about a barred owl that somebody finally named the bird Judge Hootsworth. I still do not know who won. I have also been told there is an entire board game called Wingspan about birds. I shoe horses for a living. I have enough expensive hobbies.

Most of what I know about horses comes from more than twenty years of working around them. I am not a veterinarian. I am not a forensic pathologist, biomechanical engineer, or medical doctor. Although I completed veterinary-technician coursework, I never became a veterinary technician. I know horses. I do not diagnose human skull injuries. That distinction matters here.

I knew Rowan Vale because Vale boarded horses at Whispering Pines and I was around

the stable regularly. I will say up front that I did not particularly like Vale.

Vale struck me as entitled and too eager to make sure everybody knew how much money Vale had. Vale could also be impatient with people who worked at the barn. I came from the other side of that arrangement. I spent years as a stable hand before I saved enough money to start my own business, so I probably took Vale's attitude more personally than somebody else might have.

I saw Vale shout at Lane and other stable workers on several occasions. That bothered me. Lane reminded me of people I worked beside when I was coming up - somebody doing dirty, physical work that many horse owners do not think much about as long as everything gets done. I considered Lane hardworking and deserving of the opportunities I had once wanted for myself.

Those feelings made me increasingly sympathetic toward Lane when Vale complained about Lane. I recognize that. If someone wants to say I liked Lane better than I liked Vale, that is true.

I also saw Lane deal with difficult horses and difficult people. Lane was usually calm around frightened horses. I saw Lane remain composed during confrontations with Vale and other boarders even when those people were upset. That does not tell me what happened when Vale died. It is simply what I observed over the years I knew Lane.

My more important experience for this case concerns Baylee.

I regularly provided Baylee's hoof care, so I had repeated opportunities to handle Baylee and observe Baylee's temperament. Baylee was manageable most of the time, but Baylee could become anxious when crowded or approached suddenly in a confined area.

I personally saw Baylee become nervous in a stall. I also saw Baylee kick out or strike the stall wall when agitated. A horse can kick with tremendous force, and the movement can

happen very quickly, particularly when the horse feels startled, crowded, or trapped.

A horse does not have to be generally vicious or dangerous to kick somebody. Horses are prey animals. Their reaction to fear can be to move away, bolt, rear, or kick. A person can handle the same horse safely a hundred times and still get hurt on the hundred-and-first if the circumstances are wrong.

I had also seen Baylee go from highly agitated to appearing calm again within a matter of minutes. That is not unusual. Horses do not stay frightened forever simply because something frightened them a few minutes earlier.

For that reason, the fact that Baylee was reportedly relatively calm when emergency responders arrived does not tell me Baylee was calm when Vale was injured. I was not present for either moment, so I cannot say what Baylee actually did. I can only say that, based on my experience with Baylee, a change from highly agitated to relatively calm within a few minutes would not surprise me.

I had seen Vale handle Baylee in ways I considered unnecessarily rough or impatient. I had also seen Baylee react nervously to Vale more than once. I do not mean that Vale routinely abused Baylee. I mean Vale sometimes pushed the horse harder or approached more abruptly than I thought was wise with a horse that could become anxious.

Before Vale died, however, I had never told anyone that Baylee should be removed from Whispering Pines. I never recommended that Baylee be labeled dangerous or subjected to special handling restrictions because of kicking behavior. As far as I knew, Baylee had never seriously injured Vale or anyone else before Vale's death.

I am not claiming Baylee had some long history of attacking people. Baylee did not.

Baylee was unshod at the time Vale died. An unshod hoof does not necessarily leave the

neat horseshoe-shaped mark people sometimes picture when they hear “horse kick.” There is no metal shoe to make that shape. An unshod hoof can strike with tremendous force without leaving a recognizable horseshoe pattern.

That is something I know from working with hooves and horses. What I cannot do is look at Rowan Vale’s skull injury and tell you whether it came from a hoof.

I have seen the Crime-Scene Photograph Packet, but I did not examine Vale’s body and I am not qualified to interpret a skull injury the way a forensic pathologist can. I cannot determine whether the fatal force came from Baylee’s hoof, a shovel handle, or some other blunt object. On that medical question, I defer to the forensic pathologists.

I also did not witness Vale’s death. I did not see Baylee kick Vale. I did not see Lane strike Vale. I cannot tell this jury that I know which one happened because I do not.

Based on more than twenty years working around horses, my repeated handling of Baylee, my familiarity with Baylee’s temperament, and my familiarity with the stall area at Whispering Pines, I believe the physical circumstances could plausibly have allowed Baylee to kick Vale in the area where Vale was found.

That opinion comes from horse experience and familiarity with Baylee, not from physical evidence proving that Baylee kicked Vale.

I am familiar with the Whispering Pines Stables Scene Diagram (Exhibit 1) and the Crime-Scene Photograph Packet (Exhibit 2). The Whispering Pines Stables Scene Diagram (Exhibit 1) shows the general layout of an area I knew from regularly being at the stable. I am also familiar with the Horse Care and Temperament Records (Exhibit 8) concerning Baylee and the Text Message/Social-Media Packet (Exhibit 7).

I am also familiar with the Photograph of Baylee’s Stall Sign and Feeding Instructions

(Exhibit 11). I recognize the sign from my visits to Baylee's stall before Vale died.

Nothing in those materials changes the limitation I have already stated. I can explain what I know about Baylee and horse behavior. I cannot tell a jury that a kick actually occurred.

I know the State may point out that I disliked Vale and sympathized with Lane. That is fair. I did dislike Vale. I thought Vale could be rude, entitled, and too willing to look down on people who worked for a living. I also respected Lane as a hardworking horse person.

But I am not saying Baylee kicked Vale because I want to help Lane. I am saying a kick was physically plausible because I knew Baylee, worked with Baylee, and have spent more than twenty years working around horses that sometimes react suddenly and violently when they feel trapped.

There is an important difference between saying something could have happened and saying I know it did happen. I do not know what happened in that barn.

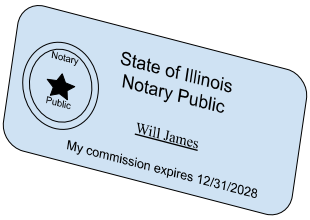
I do know that Baylee was unshod, that Baylee could become anxious in confined spaces, that I personally saw Baylee kick out when agitated, that Baylee could calm down quickly afterward, and that I had seen Vale make Baylee nervous before. Those are things I observed myself.

Further affiant sayeth not.

Respectfully submitted,

Tatum Crowe

Signed and sworn before me on
November 12, 2026.
Will James



DEFENSE WITNESS AFFIDAVIT: DR. FINLEY SLOANE

My name is Dr. Finley Sloane. I am a board-certified forensic pathologist and operate a private forensic pathology consulting practice. Before entering private practice, I worked in a government medical examiner's office performing autopsies and investigating sudden, accidental, unexplained, and suspected criminal deaths. I now frequently review autopsies performed by other pathologists and provide opinions in cases where the cause or manner of death is disputed.

I earned my undergraduate degree in biology from the University of Illinois Chicago and my medical degree from Loyola University Chicago Stritch School of Medicine. I completed residency training in pathology at the University of Chicago and later completed specialized fellowship training in forensic pathology in Illinois. My complete education, training, publications, certifications, and professional experience are contained in the curriculum vitae attached to my expert report.

I have a reputation for questioning conclusions that I believe extend beyond the available evidence. Some colleagues refer to this as necessary scientific skepticism; others use less flattering terminology. I consider it the fundamental obligation of my profession. Forensic pathology requires us to state not only what the evidence proves, but precisely where the evidence stops.

I have testified for government and prosecution entities as well as criminal defendants. I once learned that criticizing a ten-point fingerprint identification in a room full of forensic examiners is an exceedingly effective way to ruin a dinner. Since then, I generally confine my critiques to pathology. I also remember an expert in another case referring to expert-witness compensation as the "big bucks." I prefer "professional fees." It sounds better on an invoice.

It is one thing to discuss the principles of clinical objectivity *in vitro* - in the sterile vacuum of academia. It is quite another to practice them *in vivo*, amid the messy realities of an investigation. In either setting, I consider the obligation the same: distinguish what the evidence supports from what it does not.

Lane Mercer's attorneys retained me to review Rowan Vale's death. I am aware that the prosecution may attempt to make a spectacle of my consulting fee. I have spent approximately 18 hours reviewing the materials and preparing my opinions in this case. I charge $700 per hour and an additional $10,000 if I testify. To someone unaccustomed to forensic consulting, those figures might sound like a significant sum. I am compensated for years of specialized training and the time required to review the evidence, not for delivering a particular answer. My fees are not contingent upon my opinion or the outcome of this case, and I have previously reached opinions unfavorable to parties who retained me.

I did not perform Vale's original autopsy and never examined Vale's body before burial. Dr. Remy Calder performed the autopsy. I also never personally inspected the stall in the condition it was in when Vale died.

My opinions are based on Dr. Calder's autopsy report and documented medical imaging findings (Exhibit 9), the Crime-Scene Photograph Packet (Exhibit 2), the Shovel Photographs with Measurements (Exhibit 3), and the Forensic Laboratory Report (Exhibit 4). I am also familiar with my own expert report and attached curriculum vitae (Exhibit 10).

My review in this matter followed the same methodology I ordinarily use when conducting an independent forensic-pathology consultation. I systematically reviewed the documented autopsy findings and medical imaging, evaluated the location and characteristics of the injuries, considered the laboratory and scene information, and compared the physical findings

with medically recognized blunt-force mechanisms and reasonable alternatives. Independent review using those methods is routinely performed and generally accepted in forensic pathology. I did not rely on any new, novel, or experimental forensic technique in reaching my opinions in this case. Dr. Calder had the distinct advantage of examining Vale directly; if a finding was not adequately documented in the report, photographs, or imaging, I cannot retroactively conjure it.

I must also clearly define the parameters of my expertise. I did not examine Baylee. I am not a veterinarian and have no specialized training in veterinary medicine or equine biomechanics. My discipline concerns injuries to the human body. I can evaluate whether different forms of blunt force are capable of producing an injury, but I cannot, and will not, tell this jury, as an expert on horses, precisely how Baylee moved or behaved.

I also cannot state to a reasonable degree of medical certainty that Baylee actually kicked Vale. That is not my opinion.

Let me be clear: Dr. Calder and I agree on the fundamental cause of death. Rowan Vale died from a single significant blunt-force injury to the head. That is a matter of basic trauma pathology, and it is not in dispute between us. The disagreement is whether the medical evidence identifies how that injury occurred strongly enough to classify the death as homicide. In my opinion, it does not.

When comparing possible mechanisms of blunt-force injury, I do not simply ask whether an object could have caused the wound. I look for findings that may distinguish one mechanism from another, including a distinctive patterned injury, embedded or transferred material, the distribution of force, associated trauma, and findings that may favor or exclude reasonable alternatives. No single feature necessarily answers the question; the findings are evaluated together. In Vale's case, the injury does not contain a distinct patterned imprint that can be

matched specifically to the shovel handle recovered at Whispering Pines Stables.

I also found no wood fibers, splinters, paint, metal fragments, or other foreign material documented in the wound that connects the injury to the shovel. That does not mean the shovel could not have caused the injury. It means the wound itself contains no such physical evidence tying it to that particular object.

I agree that a forceful strike with the rounded handle of the shovel could have caused Vale's injury. The shovel is a medically possible weapon. However, in science, "could have" and "did" are two entirely different conclusions.

I must also respectfully reiterate what the blood on the shovel does and does not establish. Vale's blood was found on the shovel handle. That proves contact with Vale's blood. It does not, by itself, prove that the shovel delivered the fatal blow. Blood may be deposited during the event that causes an injury, but it may also reach an object through later contact or transfer.

I also considered whether a horse kick could have produced Vale's injury. I recognize that the terminology of blunt-force injury can be difficult for the average person to digest. I shall therefore attempt to put this in simpler terms: Baylee was unshod. An unshod hoof can produce a broad, irregular blunt-force injury rather than a recognizable horseshoe-shaped mark.

No clear hoof-shaped bruise was documented in Vale's wound. Nor was hoof debris, horsehair, soil, or biological material from Baylee documented there. Those facts do not help prove a horse kick. But the absence of a horseshoe-shaped injury does not eliminate one when the horse was unshod.

A horse's kick can generate sufficient force to produce the type of skull fracture and brain injury Vale suffered. That does not establish that Baylee kicked Vale. It establishes that such a mechanism is medically capable of producing the injury.

Vale also had abrasions and bruising. Those injuries could be consistent with Vale falling against the stall wall, floor, gate, or another barn fixture after an initial impact. They do not tell me what caused that initial impact.

The medical evidence does not establish that Vale was struck more than once. I also found no clear defensive injuries suggesting a prolonged physical struggle. A surprise attack could occur without defensive injuries, so their absence does not rule out homicide. It simply does not provide medical evidence of a prolonged fight.

Based on the materials I reviewed, there are several medically possible explanations for Vale's fatal injury. A rounded shovel handle could have produced it. A horse's hoof could have produced it. A collision with a fixed structure in the stall could also have produced blunt-force trauma.

The medical evidence does not allow me to identify one of those mechanisms to a reasonable degree of medical certainty while excluding the others. In this case, expecting the wound itself to definitively select among a shovel, a hoof, or a barn fixture asks more of the medical findings than, in my opinion, they can provide.

That is the principal difference between Dr. Calder and me.

I recognize Dr. Calder as a qualified forensic pathologist, and I do not dispute that the general methods used in the autopsy are accepted within our profession. My disagreement concerns how far Dr. Calder's conclusions extend beyond the documented findings. In my opinion, Calder assigns greater significance to the wound's configuration and the shovel's compatibility than those findings can reliably support. The absence of a distinctive patterned injury or trace evidence linking the wound to the shovel makes that distinction particularly important. A medically plausible mechanism is not necessarily the mechanism that occurred, and

I believe Calder's homicide classification gives insufficient weight to that uncertainty.

Dr. Calder classified Vale's manner of death as homicide. I believe the more appropriate classification is undetermined.

The cause of death is not undetermined. Vale died from blunt-force trauma to the head. What remains undetermined, in my opinion, is whether another person intentionally inflicted that trauma or whether it resulted from a horse-related or other accidental event.

A pathologist may consider investigative information in determining manner of death. Considering scene information, witness accounts, laboratory findings, and other circumstances together with the autopsy findings is routine and generally accepted in forensic pathology. I do not dispute that methodology.

The difficulty here is that the medical findings themselves do not select among the competing mechanisms. The injury does not uniquely match the shovel. No shovel material was embedded in the wound. The injury does not medically exclude an unshod hoof. There is no established pattern of multiple blows or prolonged struggle.

None of those things proves an accident. They simply leave meaningful medical uncertainty about how Vale received the fatal injury.

My opinion developed as I completed my review of the documented medical findings, scene photographs, laboratory results, and available investigative materials. Initially, I concluded that homicide could not be excluded. That remains true. But after evaluating the evidence as a whole, I concluded that the available findings did not reliably distinguish an intentional blow from the other medically plausible mechanisms. For that reason, my final opinion is that the manner of death should be classified as undetermined.

I am not saying Mercer did not strike Vale. I was not there. I am not saying the shovel

was not used; it could have caused the injury. And I am not saying Baylee definitely kicked Vale. I cannot make any of those statements to a reasonable degree of medical certainty.

My opinion is that the forensic medical evidence does not reliably tell us which of those things occurred.

That distinction is why I classify the manner of death as undetermined rather than accidental. Calling the death an accident would require me to select the horse or another accidental mechanism when the medical evidence does not permit me to do that. I believe classifying the death as homicide creates the same problem in the opposite direction. I am willing to say “I do not know” when I believe the medical evidence has reached its limit.

My opinion, to a reasonable degree of medical certainty, is that Rowan Vale died from a significant blunt-force injury to the head. A forceful strike from the shovel handle, a hoof strike, and a collision with a fixed stall structure remain medically possible mechanisms. The available medical evidence does not permit me to determine which occurred.

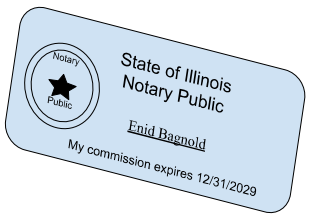
For that reason, I believe the manner of Rowan Vale’s death should be classified as undetermined, not homicide.

Further affiant sayeth not.

Respectfully submitted,

Dr. Sloane

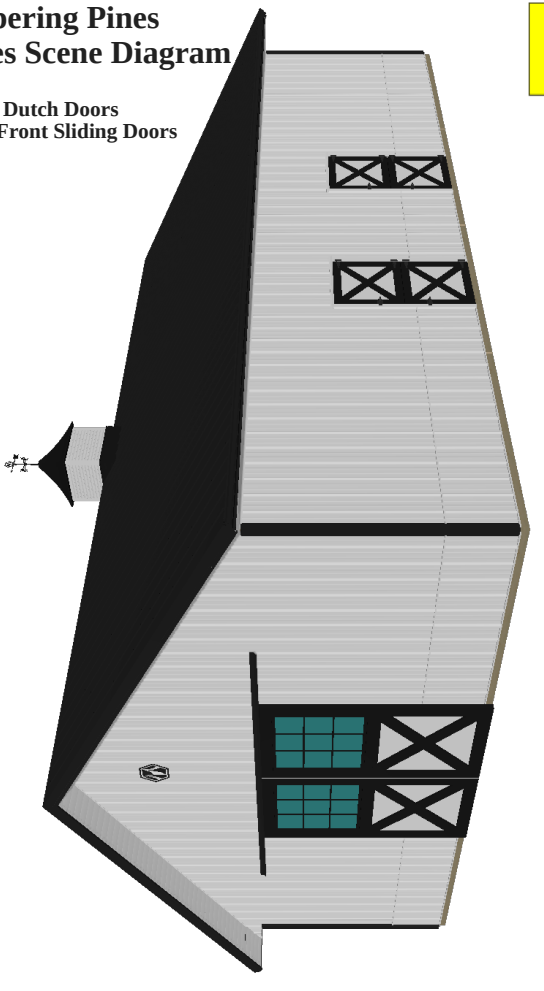
Signed and sworn before me on
November 19, 2026.
Enid Bagnold



Whispering Pines
Stables Scene Diagram

EXHIBIT 1

South - Dutch Doors
West - Front Sliding Doors



Scene Diagram - Relevant Barn Area

EXHIBIT 1

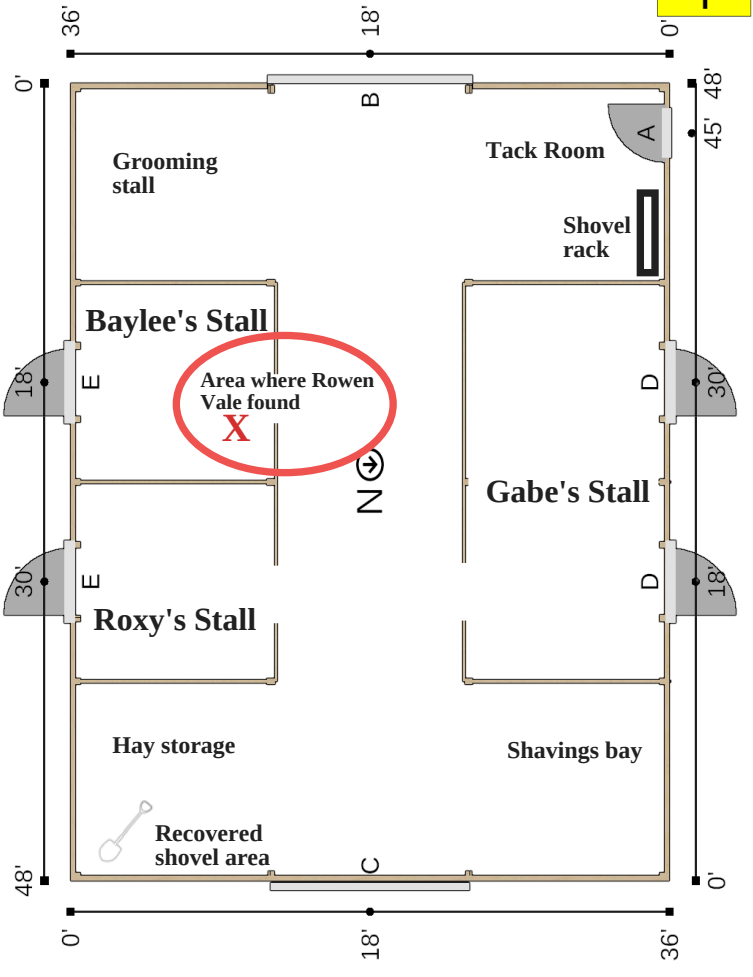


EXHIBIT 2A



EXHIBIT 2B



EXHIBIT
2C



EXHIBIT 2D



EXHIBIT 2E



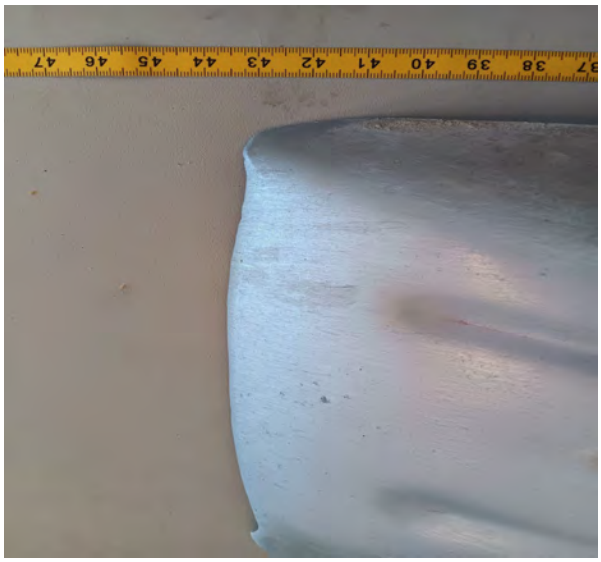
EXHIBIT 2F



EXHIBIT 3







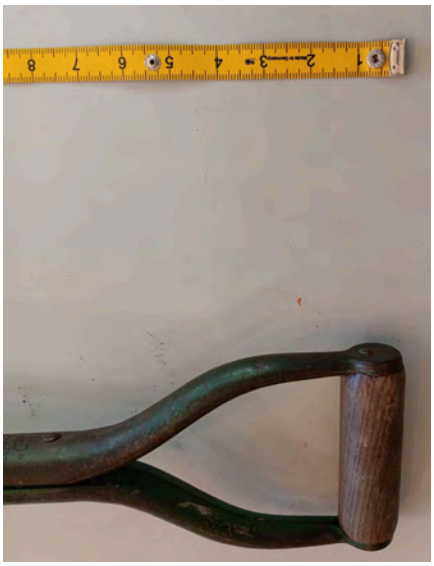


EXHIBIT 4

ILLINOIS STATE POLICE
Division of Forensic Services
Lincolnville Forensic Science Laboratory
200 South Wyman, Suite 4 | Lincolnville, Illinois 61101-1230
(217) 785-7542 Voice | (800) 255-3323 TDD

FINAL REPORT

LABORATORY REPORT

FORENSIC BIOLOGY / DNA, LATENT PRINTS, AND TRACE EVIDENCE

SUBMITTING AGENCY	Lincoln County Sheriff's Office	**LABORATORY CASE**	LFS26-004781
SUBMITTING OFFICER	Investigator Dakota Vance	**REPORT NUMBER**	LFS26-004781-R1
AGENCY CASE	LCSO26-0813-RV	**REPORT DATE**	September 3, 2026
INCIDENT DATE	August 13, 2026	**CATEGORY**	Homicide / Death Investigation
OFFENSE	First Degree Murder	**LOCATION**	Whispering Pines Stables
VICTIM	**Rowan Vale**	**SUSPECT**	**Lane Mercer**

ITEMS SUBMITTED

LAB ITEM	AGENCY ITEM	DESCRIPTION
1	1	One stable shovel, approximately 43.5 inches in overall length, recovered at Whispering Pines Stables.
2	2	Swabs and trace-evidence collection from the hair and injury area of Rowan Vale.
3	3	Known biological reference sample identified as Rowan Vale.
4	4	Known fingerprint standards identified as Lane Mercer.

EXAMINATIONS REQUESTED

Examination of the submitted items for blood and DNA; development and comparison of latent fingerprints; and examination of submitted trace material for foreign debris potentially associated with a blunt-force mechanism.

RESULTS

1	Human blood was detected on the handle of the submitted shovel. The DNA profile obtained from the blood matched the known reference sample of Rowan Vale (Item 3).
1	Latent fingerprints of comparison value developed from the shovel handle were identified to Lane Mercer through comparison with the known standards (Item 4).
2	No wood fibers, splinters, paint, metal fragments, horsehair, manure, soil, hoof debris, or other distinctive foreign material was identified in the submitted trace-evidence collection.

Report scope: These findings identify material detected on the submitted evidence. They do not, standing alone, determine when or how that material was deposited or identify the object or mechanism that caused Rowan Vale's fatal injury.

EXHIBIT 4

ILLINOIS STATE POLICE
Division of Forensic Services
Lincolnville Forensic Science Laboratory
200 South Wyman, Suite 4 | Lincolnville, Illinois 61101-1230
(217) 785-7542 Voice | (800) 255-3323 TDD

FINAL REPORT

LABORATORY REPORT

INTERPRETATION, LIMITATIONS, AND AUTHORIZATION

SUMMARY OF FINDINGS

BIOLOGICAL EVIDENCE	Rowan Vale's blood was identified on the handle of the submitted shovel.
LATENT PRINTS	Latent fingerprints on the submitted shovel were identified to Lane Mercer.
TRACE EVIDENCE	No distinctive trace material was identified that independently associates the submitted shovel, a horse, or another specific source with the injury.

INTERPRETIVE LIMITATIONS

- The biological testing cannot establish when or how Vale's blood was deposited on the shovel handle. The result cannot distinguish among deposition during the fatal event, later contact or transfer, movement of the body, or an attempted rescue.
- Fingerprint examination cannot establish when or under what circumstances Mercer's fingerprints were deposited. The reported comparison is consistent with Mercer's routine handling of the shovel as well as handling near the time of the incident.
- The absence of distinctive trace material does not exclude contact with the shovel, a horse, a fixed stall structure, or another blunt object. Trace material may not transfer, may not persist, or may not be recovered.
- This laboratory report does not determine the manner of death and does not identify the submitted shovel, a horse, or any other object as the source of the fatal injury.

METHODS AND QUALITY ASSURANCE

The reported examinations included visual and chemical screening for blood, STR DNA analysis and comparison, latent-print development and comparison, and stereomicroscopic examination of submitted trace material. Appropriate controls produced acceptable results. Comparison conclusions are limited to the items and reference standards identified in this report.

Any accredited analysis described in this report was conducted under the laboratory's ISO/IEC 17025 accreditation issued by the ANSI National Accreditation Board (ANAB), certificate XH-0824, and its associated Scope of Accreditation. This report contains the conclusions, opinions, and interpretations of the analyst whose signature authorizes the results. Testing was performed at the location listed in the header unless otherwise noted in the laboratory case record.

Detailed methods, examination dates, quality-control records, and applicable environmental conditions are maintained in the laboratory case record. Evidence will be returned to the submitting agency upon completion of all service requests unless otherwise indicated.

CERTIFICATION

I have personally completed or reviewed the examinations described in this report. Under penalties of perjury, I certify that I have examined the information provided for this document concerning the analyses conducted and that, to the best of my knowledge, the report is true, correct, and complete.

Respectfully submitted,

Avery Dalton

Avery Dalton
Forensic Scientist

DATE AUTHORIZED
September 3, 2026

Lincolnville Forensic Science Laboratory

LINCOLN COUNTY
Emergency Communications
Dispatch and Public Safety Answering Point
Lincolnville, Illinois

CERTIFIED TRANSCRIPT

EXHIBIT 5

LANE MERCER 911 CALL TRANSCRIPT

LINCOLN COUNTY DISPATCH RECORD

INCIDENT NO.	26-481763	**ASSOCIATED CASE**	LCSO26-0813-RV
DATE	August 13, 2026	**CALL RECEIVED**	9:18 p.m.
CALLER	Lane Mercer	**CALL ENDED**	9:25 p.m.
LOCATION	Whispering Pines Stables - Main Barn	**CALL TYPE**	Unresponsive Person / Traumatic Injury

TRANSCRIPTION NOTE: Prepared from the recorded emergency call. Bracketed text describes audible nonverbal sounds; ellipses indicate pauses or unclear speech.

CALL TRANSCRIPT

SPEAKER	TRANSCRIPT
DISPATCH	911. What is the address of your emergency?
MERCER	Whispering Pines Stables, outside Lincolnville - the main barn. Send an ambulance. Rowan Vale is on the floor and she is not responding.
DISPATCH	What is your name?
MERCER	Lane Mercer. I work here.
DISPATCH	Is Rowan breathing?
MERCER	I cannot tell. There is blood by the back of her head. Rowan? Rowan, can you hear me?
MERCER	*[No response is audible. Caller is breathing heavily.]*
DISPATCH	Tell me exactly what happened.
MERCER	I do not know. I heard a hard impact and Baylee moving violently in the stall. I came in and found Rowan down. I think Baylee kicked her. I didn't hit her. I just found her like this.
DISPATCH	Did you see the horse kick Rowan?
MERCER	No. I heard the impact and the horse, and then I found Rowan.
DISPATCH	Is it safe to approach? Where is the horse now?
MERCER	Baylee is still in the stall. The inside stall door was partly open. He was panicked and equipment by the wall was knocked around. I pulled the door closed before I went to Rowan.
DISPATCH	Do not enter the stall or put yourself in danger. Are you beside Rowan now?
MERCER	Yes. I checked her. There was a shovel lying close to her and other things in the way. I moved the shovel a few feet so I could get beside her. My hands and shirt have blood on them.
DISPATCH	Do not move Rowan or touch anything else unless it is necessary to give care. Put the phone on speaker.
MERCER	It is on speaker.
DISPATCH	Check for normal breathing. Put your hand on the center of her chest and watch for movement.
MERCER	I do not feel anything. I do not think she is breathing.
DISPATCH	I will tell you how to begin chest compressions. Kneel beside Rowan and place the heel of one hand in the center of her chest.

CALL CONTINUES ON NEXT PAGE

LINCOLN COUNTY
Emergency Communications
Dispatch and Public Safety Answering Point
Lincolnville, Illinois

CERTIFIED TRANSCRIPT

EXHIBIT 5

LANE MERCER 911 CALL TRANSCRIPT

CONTINUED

SPEAKER	TRANSCRIPT
RADIO	Medic 3 and LCSO Unit 12, respond to Whispering Pines Stables, main barn, for an adult female who is unresponsive and not breathing. Caller reports a head injury and a possible horse-related incident.
MEDIC 3	Copy. Medic 3 en route.
LCSO 12	Copy. Unit 12 en route.
DISPATCH	Lane, help is on the way. Keep pressing hard and fast in the center of Rowan's chest. I will count with you.
MERCER	*[Counting and sounds of movement are audible.]*
DISPATCH	When did you last see Rowan awake?
MERCER	I do not know. I did not talk to her tonight. I just heard the noise and found her.
DISPATCH	Is anyone else in the barn?
MERCER	No one else that I can see. Just Rowan, me, and Baylee.
DISPATCH	Is there a weapon or anything else dangerous near you?
MERCER	No weapon. Just the shovel I moved. It is an ordinary stable shovel. We all use it, and it normally hangs on the rack.
DISPATCH	About how much time passed between the noise and this call?
MERCER	I do not know. A few minutes, maybe. I checked Rowan, moved things, and tried to wake her. I was not looking at the clock. Please hurry.
DISPATCH	They are close. Continue the compressions and do not approach the horse.
MERCER	Baylee is getting quieter now. I can hear sirens.
DISPATCH	Stay with Rowan. The responders will take over when they reach you.
MERCER	I see the lights. They are coming into the barn.
MERCER	*[Voices and approaching footsteps are audible.]*
DISPATCH	Continue until a responder tells you to stop.
MERCER	Okay.
MEDIC 3	We have the patient. Caller can disconnect.

CALL ENDS - 9:25 p.m.

RECORDS CERTIFICATION

This transcript was prepared from the original audio recording maintained by Lincoln County Emergency Communications under Incident No. 26-481763. It is a fair and accurate transcription of the audible portions of that recording.

Quinn Ramirez
Quinn Ramirez, Records Custodian

August 14, 2026
DATE CERTIFIED

Lincoln County Sheriff's Office
INVESTIGATIONS DIVISION

EXHIBIT 6

TRANSCRIPT

INTERVIEW DATE:	August 14, 2026	**LCSO CASE #:**	LCSO26-0813-RV
OFFENSE:	Suspicious Death	**INTERVIEWED BY:**	Inv. Dakota Vance (DV)
INTERVIEW OF:	Lane Mercer (LM)	**LOCATION:**	LCSO Interview Room 2
STARTED:	12:42 A.M.	**ENDED:**	1:18 A.M.
REVIEWED BY:	Sgt. Cameron Lee		

TRANSCRIPTION NOTE: Prepared from the recorded interview. Bracketed text describes nonverbal events or actions reflected in the recording.

On August 14, 2026, Investigator Dakota Vance ("DV") interviewed Lane Mercer ("LM") at the Lincoln County Sheriff's Office. Mercer was advised of the Miranda rights and agreed to speak without an attorney present.

DV: It is 0042 hours on August 14, 2026. Investigator Dakota Vance with Lane Mercer in Interview Room 2 at the Lincoln County Sheriff's Office. This is LCSO Case Number LCSO26-0813-RV. No other persons are present. Lane, is that accurate?

LM: Yes.

DV: Before we began recording, I advised you that you have the right to remain silent, that anything you say may be used against you, that you have the right to an attorney before and during questioning, and that an attorney may be appointed if you cannot afford one. Do you understand those rights?

LM: Yes.

DV: Do you agree to speak with me now without an attorney present?

LM: Yes. I want to explain what happened.

DV: State your full name, your work, and where you live.

LM: Lane Mercer. I work at Whispering Pines Stables doing horse care, feeding, stall cleaning, and maintenance. I live in the employee housing on the property.

DV: Tell me what happened before you called 911.

LM: I was finishing evening work in the barn. I heard a hard impact and Baylee moving violently in his stall. I went toward the noise and found Rowan on the floor. Baylee must have kicked her. I did not hit Rowan.

DV: Did you see Baylee kick Rowan?

LM: No. I heard the impact and Baylee moving, and then I found Rowan.

DV: Before you found her, when was the last time you saw Rowan awake or spoke with her?

LM: I did not speak with Rowan tonight. I was doing my work, heard the noise, and found her down.

DV: Describe the area when you reached her.

LM: The inside stall door was partly open. Equipment by the wall had been knocked around. Baylee was panicked, and Rowan was down near the stall opening.

DV: What did you do first?

LM: I pulled Baylee's door shut so he could not get farther into the aisle. Then I went to Rowan and tried to see if she was breathing.

DV: What did you do with the shovel?

LM: It was lying close to Rowan with other things in the way. I moved it a few feet so I could get beside her.

DV: Did you touch Rowan before or after you moved the shovel?

LM: I do not know the exact order. I checked her and moved what was in the way. It happened fast.

DV: How much time passed between the impact and your 911 call?

LM: I do not know - several minutes. I was checking Rowan, securing Baylee, moving things, and trying to figure out what happened before I called.

DV: Why did you not call immediately?

LM: I thought I was moving quickly. I was scared, and I was trying to help her.

DV: Did you see anyone else in the barn during that time?

LM: No, but I was not watching every entrance.

DV: Baylee was described as relatively calm when emergency personnel arrived. How do you explain that?

LM: Horses can panic and then settle in minutes. He was already getting quieter when I heard the sirens.

DV: I want to return to your contact with Rowan. Are you saying you had no conversation with her that evening?

LM: Not before I found her. No.

DV: I am going to play part of the emergency recording later transcribed in the Lane Mercer 911 Call Transcript (Exhibit 5).

DV: *[A recording plays: 'I did not talk to her tonight. I just heard the noise and found her.']*

DV: That is what you told the dispatcher, and it is what you just told me. Correct?

LM: Yes.

DV: S.C. Jayne told us Rowan entered the barn while you were working and was expected to speak with you about Baylee. I am asking again: did you speak with Rowan?

LM: She came into the barn and said some things. I did not think that was what you meant.

DV: What things?

LM: Fine. We argued. It was before I heard the impact.

DV: Why did you deny speaking with her?

LM: Because I knew how an argument would look after she died. I was scared. The argument had nothing to do with what happened to her.

DV: What was the argument about?

LM: Rowan accused me of handling Baylee too roughly and said the horses were not being cared for properly. That was not true.

DV: What did Rowan say she would do?

LM: She said she would make S.C. fire me. She said she could move both horses and convince other boarders to leave.

DV: What would losing your job mean for you?

LM: I would lose my income and the place where I live. I know that.

DV: How did you respond?

LM: I got angry. I told her to stop threatening me and to stay away from me while I finished my work. We both raised our voices.

DV: Did you threaten to hurt or kill her?

LM: No. Never.

REVIEW AND CERTIFICATION

I reviewed the recording and this transcript under LSCO Case No. LCSO26-0813-RV. This document is a fair and accurate transcription of the audible portions of the recorded interview.

Cameron Lee
Cameron Lee, Sergeant

August 17, 2026
DATE REVIEWED

Text Message/ Social Media Packet
April 29 - August 13, 2026

EXHIBIT 7

ROWAN VALE left-side messages | right-side messages **LANE MERCER**

READING NOTE Communications are arranged chronologically. Date dividers indicate gaps in the thread. Times are Central Daylight Time. Display formatting has been normalized for readability.

APRIL 29, 2026 | 6:12 P.M. | TEXT MESSAGE

ROWAN Baylee looked thin today.

LANE He's been eating every feeding.

ROWAN Then explain his ribs showing more than they were two weeks ago.

LANE Horses change condition. It happens.

ROWAN Not that fast.

LANE You think I'm starving him?

ROWAN I think something isn't being done right.

MAY 2, 2026 | 7:43 A.M. | TEXT MESSAGE

ROWAN Was Baylee turned out yesterday?

LANE Yes.

ROWAN For how long?

LANE A couple of hours.

ROWAN That isn't what the turnout log shows.

LANE The board wasn't updated right away.

ROWAN Convenient.

LANE Sounds like you've already decided I'm lying.

MAY 7, 2026 | 8:17 P.M. | TEXT MESSAGE

ROWAN Baylee has a fresh rub mark under his halter.

LANE It's minor.

ROWAN It wouldn't be there if someone was paying attention.

LANE That's unfair.

ROWAN Is it?

LANE Yes. I care for over twenty horses every day.

ROWAN Maybe that's the problem.

Text Message/ Social Media Packet
April 29 - August 13, 2026

EXHIBIT 7

MAY 12, 2026 | 5:55 P.M. | TEXT MESSAGE

LANE The vet said Baylee looks fine.

ROWAN The vet saw him for ten minutes.

LANE The vet has more horse experience than either of us.

ROWAN The vet isn't here every day.

LANE Neither are you.

MAY 18, 2026 | 9:06 P.M. | TEXT MESSAGE

ROWAN Why was Baylee standing in a dirty stall this afternoon?

LANE Because he'd been in it for an hour.

ROWAN It looked like longer.

LANE You walked through and made assumptions.

ROWAN I made observations.

LANE Same thing, apparently.

MAY 23, 2026 | 7:31 P.M. | TEXT MESSAGE

ROWAN K.D. said she hadn't noticed any of the issues I've been bringing up.

LANE Because there aren't issues.

ROWAN Or because nobody's looking closely enough.

LANE There it is again.

ROWAN There what is?

LANE The implication that I'm neglecting him.

ROWAN If the shoe fits.

MAY 31, 2026 | 3:47 P.M. | TEXT MESSAGE

LANE Baylee's farrier appointment is confirmed for next week.

ROWAN Good. Maybe Tatum will have an explanation for why Baylee keeps coming up sore.

LANE You're blaming me for everything lately.

ROWAN Someone should be accountable.

LANE You want a scapegoat.

ROWAN I want competent care.

Text Message/ Social Media Packet
April 29 - August 13, 2026

EXHIBIT 7

JUNE 6, 2026 | 6:19 P.M. | TEXT MESSAGE

ROWAN I found a welt on Baylee's shoulder.

LANE Probably from turnout.

ROWAN Or from someone getting rough with him.

LANE Are you accusing me of hitting your horse?

ROWAN I'm asking questions.

LANE No, you're making accusations without saying them outright.

JUNE 10, 2026 | 8:38 P.M. | TEXT MESSAGE

LANE S.C. asked why you've been questioning everyone about Baylee.

ROWAN Because I'm concerned.

LANE You could've talked to me.

ROWAN I did. Repeatedly.

LANE Then stop going around me.

ROWAN Maybe I will if things improve.

JUNE 15, 2026 | 7:52 P.M. | TEXT MESSAGE

ROWAN I heard you lost your temper with one of the lesson horses.

LANE Heard from who?

ROWAN Doesn't matter.

LANE It does if you're repeating rumors.

ROWAN People notice things, Lane.

LANE Convenient answer.

JUNE 21, 2026 | 4:44 P.M. | TEXT MESSAGE

ROWAN If Baylee gets injured because corners are being cut, I'm not staying quiet about it.

LANE Nobody is cutting corners.

ROWAN That's not what I'm hearing.

LANE From who?

ROWAN People who are worried.

LANE Or people who want gossip.

Text Message/ Social Media Packet
April 29 - August 13, 2026

EXHIBIT 7

JUNE 24, 2026 | 9:15 P.M. | TEXT MESSAGE

LANE You know what your real problem is?

ROWAN Enlighten me.

LANE You decided months ago I'm the villain, and now every little thing proves it.

ROWAN Funny. I think my real problem is trusting the wrong person with my horse.

JUNE 30, 2026 | 7:03 P.M. | TEXT MESSAGE

ROWAN S.C. asked whether I planned to move both horses.

LANE And?

ROWAN I told them I'd rather solve the actual problem.

LANE Meaning me.

ROWAN If that's how you interpret it.

LANE That's exactly how you meant it.

JULY 5, 2026 | 6:27 P.M. | TEXT MESSAGE

ROWAN You should know I'm documenting everything related to Baylee's care.

LANE Why?

ROWAN Because if something happens, I want a record.

LANE A record for what?

ROWAN For whoever needs to see it.

LANE Is that supposed to be a threat?

ROWAN Take it however you want.

JULY 11, 2026 | 8:01 P.M. | TEXT MESSAGE

ROWAN S.C. deserves to know if the people working for them aren't doing their jobs.

LANE There it is.

ROWAN There what is?

LANE You trying to get me fired.

ROWAN If I wanted that, I'd just show them everything I've collected.

LANE You've been building a case against me?

ROWAN I've been paying attention.

Text Message/ Social Media Packet
April 29 - August 13, 2026

EXHIBIT 7

JULY 17, 2026 | 5:34 P.M. | TEXT MESSAGE

LANE K.D. told me Baylee looked healthy today.

ROWAN K.D. isn't the one paying the board bill.

LANE She's also not looking for reasons to blame me.

ROWAN Maybe she's not seeing what I see.

LANE Or maybe you're seeing what you want to see.

JULY 24, 2026 | 10:13 P.M. | SOCIAL-MEDIA DIRECT MESSAGE

LANE Why are you asking K.D. about me?

ROWAN I asked K.D. about Baylee.

LANE You always find a reason to involve her.

ROWAN That sounds personal.

LANE Leave K.D. out of it.

ROWAN Gladly, once Baylee's care stops being a problem.

JULY 30, 2026 | 7:56 P.M. | PUBLIC SOCIAL-MEDIA POST

ROWAN VALE **PUBLIC POST**

Premium boarding should mean premium care. Owners should not need to inspect every feed bucket and turnout log.

LANE Posting half a story does not make it true.

ROWAN Then the full story should not worry you.

LANE You enjoy making problems public.

AUGUST 6, 2026 | 6:58 P.M. | TEXT MESSAGE

ROWAN I told S.C. that if Baylee's care does not improve, both of my horses are leaving.

LANE You want me fired, and you don't care what happens to me.

ROWAN I want my horses safe.

LANE Then stop treating every disagreement like proof.

ROWAN S.C. can decide after seeing the record.

Text Message/ Social Media Packet
April 29 - August 13, 2026

EXHIBIT 7

AUGUST 12, 2026 | 8:46 P.M. | TEXT MESSAGE

ROWAN I will be at the barn tomorrow evening.

LANE For what?

ROWAN To talk about Baylee and whether you should still be caring for him.

LANE We have already gone over this.

ROWAN Tomorrow. I want this settled.

LANE Fine.

AUGUST 13, 2026 | 8:47 P.M. | TEXT MESSAGE

ROWAN I'm at the barn. We need to settle this tonight.

LANE I'm working.

ROWAN Meet me by Baylee's stall.

LANE Fine. Say what you came to say.

ROWAN I intend to. S.C. will hear about it tomorrow.

LANE AHHH I told you to leave K.D. out of this.

ROWAN This has nothing to do with K.D.

PACKET CERTIFICATION

The communications reproduced in this packet are authentic and appear in chronological order. Names, dates, times, message text, and sequence are accurately reflected; only the display formatting has been normalized.

Jamie Collins
Jamie Collins, Digital Evidence Specialist

September 5, 2026
DATE PREPARED

EXHIBIT 8

WPS WHISPERING PINES STABLES

LINCOLN CO. BAYLEE | HORSE CARE & TEMPERAMENT RECORDS

HORSE	OWNER	SEX	SHOEING ON AUG. 13, 2026
Baylee	Rowan Vale	Male	Unshod

CARE NOTES — APRIL–AUGUST 2026

DATE	CARE / CONDITION NOTE	SOURCE
APR. 29	RV noted that Baylee looked thinner. LM reported that he had been eating every feeding.	RV / LM
MAY 2	LM reported approximately two hours of turnout; the turnout board had not yet been updated when RV checked.	RV / LM
MAY 7	RV observed a fresh rub mark under Baylee's halter. LM described it as minor.	RV / LM
MAY 18	RV reported a dirty stall. LM stated Baylee had occupied it for about one hour.	RV / LM
MAY 31	LM confirmed a farrier appointment for the following week. RV reported that Baylee had been coming up sore.	RV / LM
JUNE 6	RV observed a welt on Baylee's shoulder. LM identified turnout as a possible cause.	RV / LM
AUG. 13	Baylee was unshod on the date of Rowan Vale's death.	TC

TEMPERAMENT & HANDLING — TATUM CROWE OBSERVATIONS

BASELINE	KNOWN TRIGGER	OBSERVED RESPONSE	RECOVERY
Generally manageable.	Crowding or a sudden approach inside a stall.	Has kicked out or struck a stall wall when agitated.	Can settle within minutes.

SAFETY HISTORY BEFORE AUGUST 13, 2026 No known serious injury to Rowan Vale or another person | No dangerous-horse designation | No removal or special-handling recommendation

SOURCE INITIALS RV - Rowan Vale | LM - Lane Mercer | TC - Tatum Crowe

EXHIBIT 9

RME FORENSIC

AUTOPSY REPORT

DR. REMY CALDER | ROWAN VALE

DECEASED	**Rowan Vale**	SEX	**Female**
ME CASE NO.	ME-26-0813-RV	AGENCY CASE	LCSO26-0813-RV
DATE OF DEATH	August 13, 2026	AUTOPSY	August 14, 2026
PLACE	Whispering Pines Stables, Lincoln County, Illinois	PATHOLOGIST	Remy Calder, M.D.
REPORT STATUS	**Final - August 28, 2026**	EXAMINATION	**Complete forensic autopsy**

FINAL ANATOMIC DIAGNOSES

Principal fatal injury: One concentrated blunt-force injury involving the side and rear portion of the head, with a depressed skull fracture and severe underlying injury to the brain.

Associated injuries: Comparatively minor abrasions and bruises consistent with collapse and contact with the floor, wall, or nearby barn structures after the principal injury.

Negative findings: No significant defensive injuries and no broader pattern of extensive trauma ordinarily expected from trampling, repeated kicks, or violent movement throughout a stall.

CAUSE OF DEATH	MANNER OF DEATH	INITIAL STATUS
Blunt-force injury of the head	**Homicide**	**Pending; later finalized**

CIRCUMSTANCES AND SCOPE

According to the investigative information provided, Rowan Vale was found unresponsive on the barn floor near Baylee's stall at Whispering Pines Stables on August 13, 2026. Lane Mercer reported hearing a hard impact and the horse moving violently but did not report witnessing the injury. A stable shovel was later collected during the investigation.

I personally performed the autopsy and examined Vale's body before burial. Between the examination and my later review of photographs, medical records, laboratory findings, investigative materials, and shovel measurements, I spent approximately 11 hours evaluating this death. No new or experimental scientific technique was used.

MATERIALS REVIEWED

The examination and final opinion included review of the Crime-Scene Photograph Packet (Exhibit 2), the Shovel Photograph and Measurement Sheet (Exhibit 3), the Forensic Laboratory Report (Exhibit 4), available medical records, and information supplied by Investigator Dakota Vance.

EXHIBIT 9

AUTOPSY FINDINGS

Rowan Vale | ME-26-0813-RV

EXTERNAL EXAMINATION

The body is that of an adult female identified as Rowan Vale. Findings of attempted emergency resuscitation are present and do not account for the fatal head injury.

The principal injury is a localized area of scalp trauma involving the posterolateral - side and rear - portion of the head. The injury is concentrated rather than broadly distributed. No unique patterned imprint permits identification of a particular object.

INTERNAL EXAMINATION - HEAD AND BRAIN

Reflection of the scalp confirms substantial hemorrhage beneath the principal injury. The underlying skull shows a depressed fracture, with a portion of the bone driven inward. There is significant corresponding traumatic injury to the brain with intracranial hemorrhage. This injury is catastrophic and fatal.

The medical findings support one principal impact. They do not establish multiple blows or a prolonged physical struggle. No separate natural disease process or independent injury was identified that would account for death.

ASSOCIATED INJURIES

Other abrasions and contusions are comparatively minor. Their distribution is consistent with Vale collapsing and contacting the floor, wall, gate, or nearby fixtures after the fatal head injury. They do not identify the mechanism of the initial impact.

POSTMORTEM IMAGING

Postmortem imaging demonstrates a focal depressed skull fracture at the posterolateral head with localized inward displacement and underlying intracranial trauma. No second acute skull fracture or broader pattern of major skeletal injury is identified.

No radiopaque foreign material is visible in association with the principal wound. The imaging findings are consistent with the subsequent autopsy examination.

PATTERN AND TRACE FINDINGS

The wound does not contain a distinctive patterned imprint that can be matched specifically to the recovered shovel. No wood fibers, splinters, paint, metal fragments, or other material from the shovel were identified in the injury.

No recognizable horseshoe pattern, clear hoof-shaped bruising, horsehair, manure, soil, hoof debris, or similar material was identified in or immediately associated with the fatal wound. Because Baylee was unshod, the absence of a horseshoe pattern does not exclude a hoof strike.

EXHIBIT 9

OPINION AND CERTIFICATION

Rowan Vale | ME-26-0813-RV

OPINION REGARDING INJURY MECHANISM

The concentrated nature of the fatal injury is more consistent with a forceful strike by a rounded or cylindrical object than with an ordinary fall onto a flat barn floor. A typical flat-surface fall ordinarily distributes force differently.

The recovered shovel handle is rounded and cylindrical. Its general diameter and curvature, as documented in the Shovel Photograph and Measurement Sheet (Exhibit 3), are compatible with the configuration of the fatal injury. The shovel handle is therefore a medically plausible weapon.

MEANING OF MEDICALLY PLAUSIBLE

This conclusion does not scientifically identify the recovered shovel as the weapon. I cannot state to a reasonable degree of medical certainty that this shovel - or any other particular object - produced the injury.

ALTERNATIVE MECHANISMS

A horse kick, collision with a stall fixture, or fall onto a rounded object cannot be completely excluded. An unshod hoof can produce broad or irregular blunt-force trauma without leaving a recognizable horseshoe mark. A horse kick causing this injury would, however, require significant and comparatively concentrated contact with the side and rear of Vale's head.

The absence of significant defensive injuries is consistent with a surprise assault, but it is also consistent with an unexpected horse-related accident. That finding does not distinguish conclusively between the competing explanations. I am not a veterinarian and have no specialized training in equine anatomy, horse behavior, or the biomechanics of horse kicks.

The Forensic Laboratory Report (Exhibit 4) identifies Vale's blood on the shovel handle. That establishes contact with her blood. It does not, standing alone, establish whether the blood resulted from direct impact or later transfer, including movement of the shovel or an attempted rescue.

MANNER-OF-DEATH DETERMINATION

At the completion of the autopsy, the cause of death was clear, but the manner was listed as pending while additional scene and investigative information was obtained. A pending classification is routine when those circumstances are necessary to determine manner.

After reviewing the autopsy findings together with the Crime-Scene Photograph Packet (Exhibit 2), available medical records, investigative information, the Forensic Laboratory Report (Exhibit 4), and the Shovel Photograph and Measurement Sheet (Exhibit 3), I classified the manner of death as homicide. Investigator Vance supplied information but did not instruct me how to classify the death.

The total evidence is, in my professional judgment, more consistent with another person deliberately inflicting the fatal blow than with an accidental horse-related injury or ordinary fall. The autopsy findings alone establish the fatal blunt-force head injury but do not conclusively determine whether Vale was intentionally struck or injured in an unusual horse-related accident.

CERTIFICATION

I certify that I personally performed this examination and that this report accurately states my findings and opinions to a reasonable degree of medical certainty, subject to the limitations stated above.

Dr. Calder
Board-Certified Forensic Pathologist

August 28, 2026
Final Report Date

EXHIBIT 9

REMY CALDER, M.D.

Board-Certified Forensic Pathologist | Regional Medical Examiner's Office

PROFESSIONAL PROFILE

Forensic pathologist serving Lincoln County and surrounding Illinois counties. Experience includes hundreds of medicolegal autopsies involving suspected homicide, accident, suicide, and deaths whose manner was initially unclear. Practice emphasizes clear separation between findings established by medical examination, opinions informed by those findings, and mechanisms that remain medically possible.

EDUCATION AND POSTGRADUATE TRAINING

B.S., Biology University of Illinois Urbana-Champaign, Urbana-Champaign, Illinois

M.D. University of Illinois College of Medicine, Illinois

Residency Anatomic and Clinical Pathology, Northwestern Memorial Hospital, Chicago, Illinois

Fellowship Forensic Pathology, Office of the Cook County Medical Examiner, Chicago, Illinois

CERTIFICATION AND LICENSURE

Board Certification Forensic Pathology, American Board of Pathology - current

Medical Licensure State of Illinois - active and unrestricted

CURRENT APPOINTMENT AND PRACTICE

Forensic Pathologist Regional Medical Examiner's Office serving Lincoln County and neighboring jurisdictions. Performs complete and limited forensic examinations; reviews postmortem imaging, histology, toxicology, scene materials, and investigative records; certifies cause and manner of death; and consults with medicolegal investigators.

Case Experience Hundreds of autopsies involving blunt-force trauma, suspected criminal violence, accidental injury, unexplained death, and cases in which competing mechanisms required correlation of medical and investigative evidence.

TEACHING AND PROFESSIONAL EDUCATION

Continuing Education Occasional instructor for law-enforcement officers, medical professionals, and investigators on cause and manner of death, blunt-force injury, scene correlation, report writing, and the limits of injury-pattern comparison.

METHODS AND SCOPE OF EXPERTISE

Methods Uses conventional and generally accepted forensic-pathology methods, including external and internal examination, postmortem imaging review, evidence collection, ancillary testing, and comparison of findings with medically recognized injury mechanisms.

Scope Limitation No specialized certification or training in veterinary medicine, equine anatomy, horse behavior, or the biomechanics of horse kicks.

EXHIBIT 10

FINLEY SLOANE, M.D.

EXPERT REPORT WITH ATTACHED CURRICULUM VITAE

Date: September 4, 2026
To: Counsel for Lane Mercer
Re: People of the State of Illinois v. Lane Mercer
Subject: Independent review of the death of Rowan Vale

Assignment and Scope

At your request, I independently reviewed Rowan Vale's death to determine whether the medical evidence reliably identifies the mechanism of her fatal head injury and supports a homicide classification. I did not undertake to decide witness credibility or whether Lane Mercer committed a crime; those are not medical opinions.

Materials Reviewed

My opinions are based primarily on Dr. Remy Calder's Autopsy Report with Attached Curriculum Vitae (Exhibit 9), including the medical imaging findings contained in that report; the Crime-Scene Photograph Packet (Exhibit 2); the Shovel Photograph and Measurement Sheet (Exhibit 3); and the Forensic Laboratory Report (Exhibit 4). I am also familiar with this expert report and attached curriculum vitae (Exhibit 10).

Methodology

I reviewed the documented autopsy and imaging findings, injury location and characteristics, laboratory and scene information, and medically recognized blunt-force mechanisms and alternatives. This independent-review method is routine and generally accepted in forensic pathology; I used no novel technique.

Summary of Opinions

Cause of death. Rowan Vale died from a single significant blunt-force injury to the head.

Mechanism. The injury does not identify a unique object or mechanism. A forceful strike from the rounded shovel handle, a hoof strike, and a collision with a fixed stall structure remain medically possible.

Manner of death. The medical evidence does not permit me to select among those mechanisms to a reasonable degree of medical certainty. The appropriate classification is undetermined, not homicide; I do not affirmatively classify the death as accidental.

EXHIBIT 10

Medical Analysis

Points of Agreement

Dr. Calder and I agree that Vale sustained one concentrated blunt-force injury to the side and rear of her head, with a depressed skull fracture and severe brain injury. We also agree that the rounded shovel handle is a medically possible weapon. Dr. Calder is qualified, and the work documented in Dr. Remy Calder's Autopsy Report with Attached Curriculum Vitae (Exhibit 9) used generally accepted forensic-pathology methods.

We disagree about the weight of the findings and whether they identify the manner of death. Medical possibility is not medical identification.

The Shovel Handle

The Shovel Photograph and Measurement Sheet (Exhibit 3) depicts a rounded, cylindrical handle capable of substantial blunt force. A strike with it could have caused Vale's injury, but the wound has no distinct patterned imprint that can be matched specifically to that handle.

No wood fibers, splinters, paint, metal fragments, or other shovel material were documented in the wound. That does not exclude the shovel, but it supplies no trace finding that independently identifies it as the instrument.

The Forensic Laboratory Report (Exhibit 4) identifies Vale's blood on the handle. That establishes contact with her blood, not when or how the contact occurred. Blood may be deposited during an impact or through later contact or transfer.

A Horse-Related Mechanism

An unshod hoof can create broad or irregular blunt-force trauma without a recognizable horseshoe-shaped mark. A horse's kick can generate sufficient force to cause the type of skull fracture and brain injury Vale suffered.

No clear hoof-shaped bruise, hoof debris, horsehair, soil, or biological material from Baylee was documented in the wound. That does not prove a horse kick, but it does not medically eliminate one. I cannot state to a reasonable degree of medical certainty that Baylee actually kicked Vale.

Fixed Structure and Associated Injuries

Vale's other abrasions and bruises could be consistent with contact with the stall wall, floor, gate, or another fixture after an initial impact. They do not identify that initial impact. A collision with a fixed structure remains medically possible.

The evidence does not establish more than one blow or clear defensive injuries suggesting a prolonged struggle. A surprise assault and an unexpected accident can each occur without defensive injuries, so their absence does not resolve the alternatives.

EXHIBIT 10

Manner-of-Death Opinion

Cause and manner are separate. The cause here is blunt-force trauma to the head. Manner addresses the circumstances in which the injury occurred. A pathologist may properly consider scene information, witness accounts, laboratory findings, and investigative circumstances when forming that opinion.

Here, the injury does not uniquely match the shovel; no shovel material was embedded in the wound; an unshod hoof or fixed structure is not medically excluded; and there is no established pattern of repeated blows or prolonged struggle.

Those observations do not prove an accident, and homicide cannot be excluded. My initial notes said as much. I reached the stronger undetermined classification after receiving additional defense information. An opinion may develop as information is added; the final conclusion must remain supported by the evidence.

An accidental classification would select a horse-related or other accidental mechanism that the evidence does not establish. A homicide classification selects an intentional mechanism despite the same uncertainty. Undetermined is the most supportable classification.

Limitations

I did not perform the autopsy, examine Vale's body before burial, or inspect the stall as it existed when she died. Dr. Calder had the advantage of direct examination; I cannot recreate a finding omitted from the report, photographs, or imaging.

I did not examine Baylee and have no specialized training in veterinary medicine, equine anatomy, horse behavior, or equine biomechanics. I address whether a proposed mechanism can medically produce the human injury; I do not reconstruct Baylee's behavior.

Compensation and Disclosure

Lane Mercer's attorneys retained me. I spent approximately 18 hours on this matter and charge $700 per hour, plus $10,000 if I testify. My compensation is not contingent on my opinion or the outcome. I have testified for government and prosecution entities and criminal defendants and have given opinions unfavorable to retaining parties.

Final Opinion

To a reasonable degree of medical certainty, Rowan Vale died from significant blunt-force head trauma. A forceful shovel-handle strike, a hoof strike, and a collision with a fixed stall structure remain medically possible. The evidence does not permit me to determine which occurred.

For that reason, I believe the manner of Rowan Vale's death should be classified as undetermined, not homicide.

Respectfully submitted,

Dr. Sloane
Board-Certified Forensic Pathologist

EXHIBIT 10

FINLEY SLOANE, M.D.

CURRICULUM VITAE

Board-certified forensic pathologist specializing in independent review of sudden, accidental, unexplained, and suspected criminal deaths.

Education and Training

Bachelor of Science, Biology, University of Illinois Chicago

Doctor of Medicine, Loyola University Chicago Stritch School of Medicine

Residency Training, Pathology, University of Chicago

Fellowship Training, Forensic Pathology, Illinois

Certification

Board Certified, Forensic Pathology, American Board of Pathology

Professional Experience

Private Forensic Pathology Consultant, Current
Reviews autopsies, medical imaging, scene information, and laboratory materials; provides independent cause- and manner-of-death opinions.

Forensic Pathologist, Government Medical Examiner's Office, prior appointment
Performed autopsies and investigated sudden, accidental, unexplained, and suspected criminal deaths.

Expert and Professional Activity

Forensic consultation and testimony
Has testified for government and prosecution entities and for criminal defendants; compensation is not contingent on opinion or outcome.

Independent review methodology
Evaluates documented autopsy findings, medical imaging, injury distribution, trace and laboratory information, scene context, and medically recognized alternative mechanisms.

Principal areas of practice
Blunt-force injury; cause and manner of death; injury-mechanism analysis; review of disputed or undetermined deaths.

EXHIBIT 11


Baylee
(bay + star)
• 1 full scoop senior am+pm
• grass or mix hay
• 1 pill am