

1
2 SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
3 CRIMINAL DIVISION MISDEMEANOR BRANCH

4 UNITED STATES

JUDGE CUSHENBERRY

5 v.

6 KEVIN SUTTON

Case No. F-8615-98.

7 Defendant.

8
9 DECLARATION OF JOSEPH P. BONO

10 I, JOSEPH P. BONO, declare and say:

11 1. I am the Laboratory Director of the Drug Enforcement Administration (DEA) Mid-
12 Atlantic Laboratory located at 460 New York Avenue, N.W., Washington, D.C. I have held
13 this position since February 1, 1999. Prior to that time, I served in the following positions
14 within DEA, and with other federal and state agencies: Program Manager, DEA Office of
15 Forensic Sciences, DEA Headquarters, Arlington, Virginia (1996-1999); Supervisory
16 Chemist, DEA Special Testing and Research Laboratory, McLean, Virginia (1991-1996);
17 Senior Forensic Chemist, DEA Mid-Atlantic Laboratory, Washington, D.C. (1988-1991);
18 Senior Forensic Chemist, Naval Investigative Service Regional Forensic Laboratory, San
19 Diego, California (1986-1988); Forensic Chemist, Naval Investigative Service Regional
20 Forensic Laboratory, Pearl Harbor, Hawaii (1984-1986); Supervisory Forensic Chemist,
21 Naval Investigative Service Regional Forensic Laboratory, Naples Italy (1981-1984);
22 Laboratory Director/Senior Criminalist, St. Louis County Police Department Laboratory, St.
23 Louis, Missouri (1974-1981).

24 I have inspected all eight DEA laboratories to ensure compliance with DEA standards.
25 As part of my official duties, I have also inspected forensic science laboratories in New York
26 and California. I have been asked, as a representative of DEA and the United States
27 Department of State, to inspect laboratories in Caracas, Venezuela, Quito and Guayaquil,
28 Ecuador, Georgetown, Guyana.



1 Declaration of Joseph P. Bono
2 Laboratory Director
3 DEA Mid-Atlantic Laboratory

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4 I have visited forensic science laboratories in the states and countries named above,
5 plus other forensic science laboratories throughout the United States and Europe. I have
6 been qualified in court as an expert witness in forensic chemistry hundreds of times. I have
7 testified in Federal, state, municipal, and military courts in the District of Columbia, Virginia,
8 Maryland, Missouri, California, Washington State, Arizona, Hawaii, and Italy.

9 2. My duties and responsibilities as the Laboratory Director include the supervision of
10 all technical and administrative functions of the DEA Mid-Atlantic Laboratory. This
11 includes ensuring the accuracy, maintenance, and reliability of all instruments, tests, and data
12 generated at the DEA Mid-Atlantic Laboratory. In that regard, I am fully familiar with how
13 these machines and instruments are used and operated. I am also familiar with the general
14 qualifications for the forensic chemists who work in the DEA Mid-Atlantic Laboratory, all of
15 whom have at least met the minimum required training of DEA forensic chemists.

16 3. The DEA Mid-Atlantic Laboratory is accredited in controlled substance
17 examinations by The American Society of Crime Laboratory Directors/Laboratory
18 Accreditation Board.

19 4. When a DEA forensic chemist analyzes an unknown substance for the presence of
20 a controlled substance, such as cocaine, tests performed by the DEA forensic chemist
21 include, but are not limited to: color screening tests, thin layer chromatography, high
22 performance liquid chromatography, gas chromatography, microcrystal tests, infrared
23 spectrophotometry, gas chromatography/mass spectrometry, and nuclear magnetic resonance
24 spectroscopy. The instrumental tests and analyses are performed by the following
25 instruments: high performance liquid chromatograph (HPLC), gas chromatograph (GC),
26 infrared spectrophotometer (IR), gas chromatograph/mass spectrometer (GC/MS), and a
27 nuclear magnetic resonance spectrometer (NMR). Based on my experience as a forensic
28 chemist, it is irrefutable that the use of these instruments has been accepted in the scientific

