

# MEMORANDUM

OFFICE OF THE CLARK COUNTY PUBLIC DEFENDER

*Public Defender*  
Darin F. Imlay  
*Assistant Public Defender*  
F. Virginia Eichacker

## INVESTIGATION DIVISION

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January 24, 2022

TO: JAKE GULLO

CLIENT: RUSSELL LESLIE MARTIN

FROM: TONI WORTHMAN

CASE NO.: C-20-351363-1

SUBJECT: KENT SOULE

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On Monday, January 24, 2022 at 10:40 a.m. I called and interviewed Mr. Kent Soule over the phone. I introduced myself as an investigator with the Clark County Public Defender's Office and explained that my office represents Mr. Russell Martin. Mr. Soule agreed to speak to me.

I began the interview by asking Mr. Soule to walk me through what took place on September 9, 2019. He said that it happened so long ago that he did not recall all the details. I told him that's okay and asked him to tell me what happened to the best of his recollection. Mr. Soule proceeded to tell me that at the racquetball court at LVAC you write your name on the board/list and the next person on the list then plays the winner of the previous game. Mr. Soule was playing on the court and left the court when he was finished; he could not remember who he was playing with that day. He said that Mr. Robert Moos was supposed to play next. However, Mr. Martin got upset because he had been waiting for a while. Mr. Soule did not recall how long Mr. Martin was waiting as he was playing at the time that Mr. Martin put his name on the list. Mr. Soule told me that the next thing he knew, "Russ got crazy and pushed Bob." When I asked Mr. Soule if either man said anything before the fight became physical, he said that when Mr. Martin wanted to play next Mr. Moos said, "Hey, hey, you're not the next on the list." Mr. Soule said that Mr. Martin got a temper and "went crazy." The next thing Mr. Soule knew, Mr. Moos was on the floor bleeding from the head.

I asked Mr. Soule if he saw either man hit the other. He said that out of the corner of his eye he saw Mr. Martin hit Mr. Moos over the head with a racquet. He then saw Mr. Moos on the ground bleeding from the head. I inquired if anything happened after that and Mr. Soule said no; Mr. Moos is an "older guy" and everyone ran over to see what had happened and to help Mr. Moos. Mr. Soule told me, "I still cannot believe it happened." He also said that they are all adults but "acted like a bunch of kids" that day. I asked Mr. Soule if he knew Mr. Martin or Mr. Moos prior to that day and he said yes; they all knew each other because they all played racquetball at the club. Mr. Soule is pretty sure he played a game with Mr. Moos that day.

At the conclusion of the interview Mr. Soule asked me why this case is still going on. I explained that because of the pandemic jury trials had been paused for some time and this case was postponed repeatedly. He also asked if Mr. Martin was in custody and I told him that he is not. Mr. Soule explained to me that he was "not trying to defend Bob or Russ," he just wanted to be fair to both. He also said that he does not want Mr. Martin to go to jail. I told Mr. Soule that I understood, and I appreciated him taking the time to recount what happened that day. I asked if I could call him back with any further questions and he said yes. The call ended.



LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
VOLUNTARY STATEMENT

Event #

LV190900042634

THIS PORTION TO BE COMPLETED BY OFFICER

Officer's Name <b>BATTERY / W DW E / VOP</b>	Date Occurred <b>09/09/19</b>	Time Occurred <b>5 PM</b>
Location of Occurrence <b>9615 W. FLAMINGO RD, LVN 89147</b>	Sector/Beat <b>53</b>	<input type="checkbox"/> City <input checked="" type="checkbox"/> County

Your Name (Last, First / Middle) <b>Soule Kent The</b>		Date of Birth	Social Security #
Race <b>Caucasian</b>	Sex <b>M.</b>	Height <b>5'7"</b>	Weight <b>170</b>
Hair <b>Black</b>	Eyes <b>Brown</b>	Work Sched. (Hours)	(Days Off)
Business / School <b>Appraiser</b>			
Residence Address: (Number & Street) <b>10101</b>		Bldg / Apt. #	State Zip Code <b>3</b>
Bus. (Local) Address: (Number & Street)		City	State Zip Code
Best place to contact you during the day <b>AT 8570</b>		Best time to contact you during the day <b>after 12 Noon</b>	
Can You Identify the Suspect?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

## DETAILS

It all started on the Hallway in front of the Racket Ball Court. Russ is the fifth guy on the list and he insisted in going into the court. And one of the five guys (Prist) decided not to play. Bob didn't know it so Bob said there was four guys in the court already then Russ started to shove & push his face against Bob. Bob pushed back with his Racket. Then they got into a serious fight. Russ hit Bob with his racket to his head and pushed Bob down on the floor. Bob's head started to be bleeding.

I HAVE READ THIS STATEMENT AND I AFFIRM TO THE TRUTH AND ACCURACY OF THE FACTS CONTAINED HEREIN. THIS STATEMENT WAS COMPLETED AT (LOCATION) **9615 W. FLAMINGO RD, LVN, 89147** ON THE **9TH** DAY OF **SEPTEMBER** AT **1700** (AM/PM), **2019**.

Witness/Officer: **K. Von Dillig** (SIGNATURE)  
Witness/Officer: **K. Von Goldberg** (PRINTED) PH # **15121**  
LVMPD 86 (REV. 6-00) (PRINTED)

SIGNATURE OF PERSON GIVING STATEMENT