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## STATEMENT OF FACTS

The following narrative includes facts the State intends to prove at trial.

After completing his service in the United States Navy, Craig Jackson pursued a medical career and enrolled in a medical school in Guatemala. While attending medical school, he met the defendant, then known as Reina Gabriela Matute-Ruano and commonly referred to as “Gabby.” The two began a relationship and married in 2008. Following the marriage, the defendant assumed the name Reina Gabriela Jackson.

After Dr. Jackson completed medical school, the couple relocated to Florida so he could complete his medical training. Their daughter, Isabella, was born there in 2013. In 2014, after finishing his training, Dr. Jackson accepted a physician position with Bay Clinic in Coos Bay, Oregon, and the family subsequently moved to the Coos Bay area.

### ***A. Divorce Proceedings***

Unfortunately, the relationship between Dr. Jackson and the defendant began to deteriorate. In 2016, the defendant filed for divorce in Coos County Circuit Court Case No. 16DR19001, a divorce which was finalized in 2017. Under the judgment, the defendant was awarded maintenance spousal support in the amount of \$3,000 per month beginning December 1, 2016, as well as transitional spousal support in the amount of \$2,000 per month beginning the same date. Both support obligations were set for a duration of five years, terminating in December 2021.

The defendant was also awarded sole custody of their daughter, Isabella. Parenting time was governed by a Parenting Time Agreement. Yet soon after entry of the judgment, disputes arose regarding the defendant’s compliance with Dr. Jackson’s court-ordered parenting time. Multiple hearings and motion practice followed.

### ***B. Sex Abuse Allegations***

On December 22, 2017, the defendant reported allegations that Dr. Jackson had sexually abused Isabella. At the same time, the defendant moved in the dissolution case to modify parenting time. The allegations were investigated by the Coos Bay Police Department, and Isabella was interviewed at the Kid’s

1 Hope Center. No criminal charges were filed, and as a result, the motion to modify parenting time in the  
2 dissolution case was denied on June 18, 2018.

3 ***C. Assault and Burglary Charges***

4 On October 21, 2018, when Defendant arrived at Dr. Jackson's residence to pick up Isabella, she  
5 observed that Dr. Jackson had a female friend visiting. The defendant became enraged and smashed the  
6 window next to the door of the house. She then entered Dr. Jackson's home without permission and  
7 assaulted him.

8 As a result, the State filed burglary and assault charges against her in Case No. 19CR19279. The  
9 defendant later pleaded guilty to Burglary in the First Degree and was sentenced on July 3, 2019. Sometime  
10 after the burglary, Dr. Jackson moved from the home where this occurred and into his current Stanton Street  
11 residence.

12 ***D. Changes in Custody***

13 Dr. Jackson subsequently sought custody of Isabella, relying in part on the conduct underlying the  
14 burglary case. While the matter was pending, the defendant sent Isabella to Guatemala in violation of the  
15 parenting time agreement. Isabella was eventually returned to Coos County, and the court thereafter ordered  
16 that her passport be placed in custody of the court. On January 13, 2020, the court granted Dr. Jackson's  
17 motion and awarded him custody of Isabella, and her passport was transferred to Dr. Jackson's possession.

18 Soon thereafter, Dr. Jackson remarried a woman he met in China, Amy Jackson<sup>1</sup>. She moved to  
19 Coos Bay and started living at the Jackson residence on Stanton Street in October 2020.

20 Therefore, entering 2021, Dr. Jackson was remarried, he maintained full custody of Isabella,  
21 including exclusive access to her passport, and both forms of spousal support, which totaled \$5,000/month,  
22 were stopping at the end of the year.  
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27 <sup>1</sup> Amy Jackson also goes by and is referenced in pleadings and reports as Yen Zhou, her Chinese name. She has  
28 requested that the parties and court refer to her as Amy Jackson, which we will do for the remainder of the brief and  
through trial.

1            *E. August 2, 2021*

2            On August 2, 2021, at approximately 3:27 a.m., the North Bend Police Department received a series  
3 of 911 calls reporting that someone had been shot at 3721 Stanton Avenue in North Bend, Oregon. The first  
4 call was placed by Amy Jackson. Because Ms. Jackson has limited English proficiency, dispatchers had  
5 difficulty understanding her report. Ms. Jackson then contacted a friend, Lina Dorfmeister, who speaks  
6 Mandarin Chinese. Members of the Dorfmeister family then contacted the North Bend Police Department  
7 to provide additional information.

8            Officers arrived at the residence at approximately 3:35 a.m. Ms. Jackson was visibly frightened and  
9 initially struggled to explain the circumstances. Upon entering the residence, officers located Dr. Jackson's  
10 body lying in a hallway between the master bedroom and a bathroom. Officers asked Ms. Jackson if this  
11 was a suicide, which Ms. Jackson, through broken English, quickly denied. Officers immediately  
12 recognized that Dr. Jackson had been shot and quickly appreciated that the scenario indicated a homicide.  
13 They conducted a protective sweep of the residence to determine whether any other individuals were inside.  
14

15            The residence is a two-story structure with the main entrance and living area on the upper level,  
16 accessible directly from Stanton Avenue. The lower level contains several rooms and a door leading to the  
17 backyard. Officers noted that this lower-level exterior door was open when they cleared the home. No one  
18 else was found inside. Medical personnel then responded and pronounced Dr. Jackson deceased on the  
19 scene.

20            The property is located at the end of a dead-end portion of Stanton Avenue, situated at the top of a  
21 steep hillside overlooking Coos Bay and the wood-chip terminal off Highway 101. The backyard ends at a  
22 sharp drop-off down to Highway 101. A small residence is located partway down the incline, and an  
23 additional small structure—formerly used as an upholstery shop—is situated at the base of the hill near the  
24 highway.

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***F. Interview of Amy Jackson at the Scene***

Ms. Jackson was later interviewed with the assistance of an interpreter. During that interview, she stated that she and Dr. Jackson had been in bed in the master bedroom when she awoke and observed two individuals in the room. She screamed, waking Dr. Jackson, after which Dr. Jackson fought with the intruders. Ms. Jackson stated that she rolled off the bed, hid underneath it, and heard a gunshot. She remained concealed under the bed for a period and, when she believed it was safe, emerged to find Dr. Jackson lying in the hallway outside the bedroom. She attempted to call the police and ultimately contacted the Dorfmeister family for assistance. Officers arrived shortly thereafter.

1                   **G. Crime Scene Analysis**

2                   The body of Dr. Jackson was examined both at the scene and later at an autopsy. He was found to  
3 have sustained two gunshot wounds. The first wound had an entrance located approximately 1-2 inches  
4 above the rectum, with the exit wound on the front of the right thigh. The second wound entered on the  
5 right side of Dr. Jackson’s face and exited on the opposite side of his head. The entrance wound to the head  
6 displayed extensive stippling, indicating that the firearm was discharged from close range.

7                   Investigators, including officers and crime-lab personnel, processed the scene. In the master  
8 bedroom, they located blood on the right side of the bed, as well as bullet fragments on the bedding.  
9 Examination of the room revealed multiple bullet strikes in the walls, indicating that several shots had been  
10 fired in the bedroom. Dr. Jackson’s body was found lying on the hallway floor, with his head positioned  
11 near the open door to the bathroom. Inside the bathroom, investigators located a spent bullet on the floor.

12                   Based on the physical evidence, investigators concluded that the assailants likely positioned Dr.  
13 Jackson facedown on the bed when they shot him in the rectum, accounting for the blood and bullet  
14 fragments found on the bed. They further concluded that Dr. Jackson subsequently moved into the hallway,  
15 where he was shot in the head, consistent with the spent bullet recovered in the bathroom.

16                   **H. Video Footage of Suspects Entering and Exiting Dr. Jackson’s House**

17                   As part of their initial investigation, officers canvassed the surrounding area. They obtained  
18 surveillance footage from a residence overlooking the street in front of Dr. Jackson’s home. At  
19 approximately 3:16 a.m., the video captured three individuals walking from a vacant lot near the Jackson  
20 residence. Although their faces were not visible, the footage appears to show two males and one female.  
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20 The video shows the three individuals approaching Dr. Jackson's home; they are not seen again in  
21 the video. Because the residence is located on a dead-end street, any person leaving by way of the roadway  
22 would have needed to retrace at least part of their route and would have been visible on the same camera.  
23 No one appeared on the video again until officers arrived at 3:35 a.m.

24 Given that no one other than Dr. and Ms. Jackson was found inside the residence, investigators  
25 sought to determine how the three individuals had left the area. During the continued neighborhood canvas,  
26 officers located additional surveillance cameras at the residence situated directly below the Jackson home  
27 on the steep hillside. Review of that footage showed an individual emerging from the brush below Dr.  
28

1 Jackson's residence at 3:27 a.m., concealing something in a backpack, and running off. One minute later,  
2 at approximately 3:28 a.m., the video shows another male and a female coming out of the same brush area.



12 Although the footage did not capture their faces, the three individuals appear consistent in number,  
13 timing, and general build with those observed on the earlier video approaching the Jackson home. The route  
14 is also consistent with the only escape route from the house other than the way they came in. The photo  
15 below shows the general location of the cameras that caught the escape in relation to Dr. Jackson's home.  
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During their continued search of the surrounding terrain seen above, officers located what appeared to be a rough footpath leading from Dr. Jackson's home down to the building below. Investigators walked the path from the lower residence up toward the Jackson home. Near the bottom of the path, they located a disposable latex glove, which was collected as evidence. Subsequent DNA testing of the glove yielded an unknown male DNA profile.

***I. Initial Contact with the Defendant***

As investigators developed information about the victim, they learned that the defendant was Dr. Jackson's former spouse and the mother of his child. They determined she needed to be contacted and, at a minimum, notified of Dr. Jackson's death. Police learned that the defendant resided off Highway 241 in Coos Bay, approximately 20 miles from Dr. Jackson's home and a roughly 35-to-45-minute drive.

Detective Sergeant Aaron Whittenburg and then-Deputy Theron Coleman were assigned to make the notification. They arrived at approximately 7:56 a.m. The property had a single driveway leading to two

1 separate residences, with the defendant's home located at the end of the long driveway. As the officers  
2 drove up the driveway, they observed fresh tire tracks leading toward the residence through the morning  
3 dew. Upon arrival, they saw a tan Nissan Altima parked in front of the home.

4 The officers noted that the defendant displayed little emotion when informed of Dr. Jackson's  
5 death. The officers asked whether anyone else was inside the residence, and the defendant stated that only  
6 her daughter was present. They requested permission to walk through the home to confirm that no other  
7 individuals were inside. While inside, the officers observed a large fire burning in the fireplace, making the  
8 home so extremely warm that all the windows were open. It was so hot that Deputy Coleman chose to wait  
9 outside.

10 The defendant told officers that she had a cousin from Philadelphia who had recently visited but  
11 had left a few days earlier. She identified this person as "Leonardo." Sergeant Whittenburg asked the  
12 defendant about the custody arrangement between her and Dr. Jackson regarding Isabella. The defendant  
13 stated that Dr. Jackson had sole custody and that she exercised parenting time on a weekly schedule,  
14 meeting at the school each Friday to exchange the child. She also stated that she was not employed and  
15 received \$3,000 per month in spousal support. The investigators left after Defendant stated she needed to  
16 make breakfast for Isabella. They returned about an hour later and asked if she would come to North Bend  
17 to answer a few more questions, and she agreed.

18  
19 ***J. Defendant's Interview with Detective Nibblett***

20 At the police station, the defendant was introduced to Oregon State Police Detective Tina Nibblett,  
21 who assumed responsibility for the interview. The defendant told Detective Nibblett that her divorce from  
22 Dr. Jackson had been difficult and that she did not like having contact with him. She explained that she and  
23 Dr. Jackson alternated weekly parenting time with Isabella, exchanging the child each Friday at the school.  
24 She stated that she did not communicate directly with Dr. Jackson. The defendant then claimed that Amy  
25 Jackson had discussed the possibility of divorcing Dr. Jackson, raising issues regarding Dr. Jackson's  
26 fidelity and assertions of \$1,000 payments for prostitutes.

1 The defendant initially stated she had never been to the residence that Dr. Jackson shared with Ms.  
2 Jackson. She then amended that statement, claiming that approximately four months earlier she had needed  
3 to deliver a schoolbook to Isabella. She claimed that she hired a transient to accompany her in her vehicle  
4 to Dr. Jackson’s home and that this individual approached the front door and delivered the book, a toy, and  
5 a drink to Isabella when she answered the door. But Defendant did not state that she had been inside the  
6 house.

7 The defendant also told Detective Nibblett that she had a new boyfriend named Leonardo Garcia,  
8 whom she said she met through a dating application – the same name of her “cousin” visiting her from  
9 Philadelphia. She reported that although they had communicated through social media, they had not met  
10 in person. The interview ended and Defendant left without issue.

11 ***K. Search Warrant of Defendant’s House and Car***

12 On August 9, investigators executed a search warrant at the defendant’s house and her Nissan  
13 Altima. Among the items seized, investigators found a T-shirt recovered in the brush outside the residence,  
14 evidence of a \$40,000 check drawn on Dr. Jackson’s credit union account and negotiated just days after Dr.  
15 Jackson’s death, and floor-plan map of Dr. Jackson’s residence.

16 ***a. Recovered Shirt from Residence and DNA***

17 Investigators tested the shirt for DNA, which identified a male DNA profile on the shirt. That DNA  
18 profile matched the male DNA profile recovered from the latex glove found on the hillside escape path.  
19 The DNA profiles indicate both items were handled or worn by the same unknown male, placing the same  
20 man at defendant’s house and at the murder scene, two locations that are 20 miles apart.

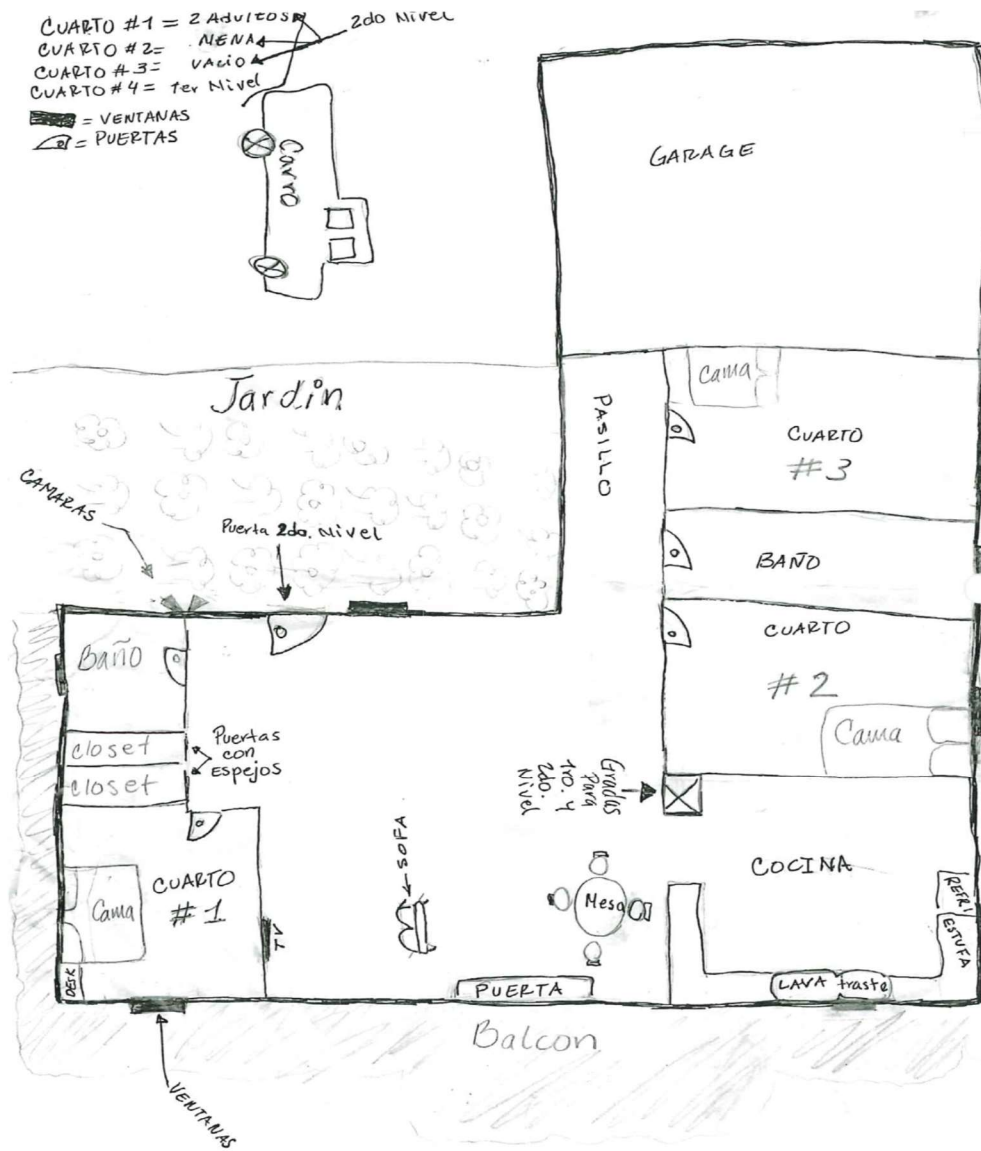
21 ***b. \$40,000 Check***

22 Witnesses will testify that Dr. Jackson would never have given the defendant \$40,000. Yet the  
23 search warrant uncovered evidence that the defendant negotiated a \$40,000 check that was drawn on Dr.  
24 Jackson’s Navy Federal Credit Union account after his murder. The check was written to “Celso Herrera”  
25 and deposited into his account just days after the murder. A witness for the state will testify that they  
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1 observed the defendant practicing Dr. Jackson's signature while at a park, a few days before a check was  
2 negotiated.

3 **c. Hand-drawn map**

4 Investigators located a hand-drawn map depicting the main floor of Dr. Jackson's home inside a  
5 seat-back pocket of the defendant's vehicle.



25 In Defendant's interview with Detective Niblett on the day of the murder, she stated that she never  
26 went inside Dr. Jackson's Stanton Avenue home. This map appears to be a more complete version of a  
27

1 similar draft located during the warranted search of defendant’s home. Yet this map was found in her car,  
2 and a later analysis found the defendant’s fingerprints on the map.

3 ***L. Absconding to Guatemala***

4 As noted earlier, the defendant had been convicted of Burglary in the First Degree for breaking into  
5 Dr. Jackson’s previous home and assaulting him. At the time of Dr. Jackson’s death, she remained on  
6 supervised probation for that offense. Her probation conditions required her to report as directed and  
7 prohibited her from leaving the state without prior authorization.

8 Instead, just over three weeks after the murder, on August 24, 2021, the defendant withdrew  
9 Isabella from school and informed school personnel that she and Isabella were moving to Guatemala. The  
10 defendant did not have permission to leave the state and failed to report as required. A motion to revoke  
11 her probation was filed, and a nationwide warrant was issued for her arrest in October 2021. The  
12 investigation later confirmed that the defendant had, in fact, returned to Guatemala.

13 ***M. Post-Arrest Investigation and Evidence***

14 Defendant was eventually detained when she flew back to the United States in June 2023. She has  
15 remained in custody pending trial.

16 One day while in custody, the defendant returned to the common area dayroom after leaving for a  
17 meeting. Another inmate asked where she had been. The defendant responded that she had been meeting  
18 with her lawyer, who had made her “watch this stupid video.” When the inmate asked what the video  
19 depicted, the defendant stated that it showed “me and the two men that killed my husband.” When asked  
20 whether it was difficult to watch, the defendant replied that it was not, explaining that “it could have been  
21 anybody in that video” and that she “just need[s] to find somebody who looks like [her].” The defendant  
22 further stated that the police would never discover that it was her friends who had helped her and expressed  
23 confidence that law enforcement would not expose their involvement. That former inmate will testify at  
24 trial.  
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1 The defendant also wrote numerous letters to relatives while incarcerated. Aware that her telephone  
2 calls from the jail were recorded, she used at least two of these letters to instruct her daughter to make  
3 certain comments during their phone conversations that the defendant believed would assist her attorneys.

4 In October 2025, she wrote her daughter the following:

5 **Isabella, when we talk on the phone, don't say anything about what you are**  
6 **reading in this letter because the police listen to our phone conversations.**  
7 **Pretend you don't know anything. When I get out, I will answer any question**  
8 **you have regarding this problem.**

9 **Isabella, if you want to help with having mommy return home soon, you can**  
10 **say this on the phone when we are speaking:**

11 **Mommy, I remember *daddy* gave you a check from the bank and I**  
12 **hid it from you in my *backpack* for several days. Then, after several**  
13 **days, I put it in your *wallet*. *Sorry* mommy.**

14 **This will help mommy and her attorneys. My attorneys will use this to fight**  
15 **for mommy against the police to get mommy out of jail. Please help me,**  
16 **honey. Farewell, love. We'll talk soon. I will write to you and call you another**  
17 **day, my beautiful love. Isabella, mommy loves you very much.**

18 Then, in December 2025, she wrote a letter to another individual asking them to help Isabella tell  
19 a story over the phone about the check, so that it would be recorded. She asked the friend to help Isabella  
20 memorize it, so it sounded natural when she was reading it on the call:

21 **Vilma, please help Isabella with that. Have Isabella copy that onto a paper**  
22 **so she can learn it as if it were a test. That way, it will be easier for her to say**  
23 **it when she reads it to me over the phone, and the story sounds more real. It**  
24 **is necessary for Isabella to have the paper or the letter so she can read it.**

25 She also told the friend to tell Isabella not to mention the letter over the phone:

26 **Please explain to Isabella that she is not supposed to say I sent it to her in a**  
27 **letter for her to repeat over the phone. It should sound like a normal and**  
28 **casual conversation between a mother and her daughter.**

The letter continued with the story Defendant wanted Isabella to repeat:

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Lo que Yo necesito es que:  
la proxima vez que hablemos por teléfono  
Quiero que me digas lo que te voy a  
escribir a Continuación:

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6  
- Mami quiero Contarte algo:

7  
8  
- Una vez que Daddy me ~~me~~ entrego a Ti, Contigo  
- daddy te dio un cheque de banco.  
Y cuando tu Y Yo entramos a Tu Carro  
Yo lo agarré Y lo metí en mi mochila

9  
10  
- Y varios días despues Yo estaba ~~vacacionando~~  
Vaciano mi mochila, Limpiandola  
Y encontré el cheque Y Yo  
Te puse el cheque en tu billetera Negra  
Sorry Mami.

11  
12  
Pero yo te devolvi de regreso el cheque mami.  
¿Mami lo encontraste?

13  
14  
Yo sé que era un cheque, porque daddy me dijo:  
que esos papelitos se los daba su banco  
Y que se llamaban "cheque de banco."

15  
16  
Mami te acuerdas que antes de dartelo  
mi daddy escribió letras y un número 40

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18  
Mami a mi me gustó ese papel  
era bonito. 😊

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As translated:

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**Mommy, I want to tell you something. One time when *daddy* dropped me off with you, *daddy* gave you a check from the bank and when you and I went inside your car, I grabbed it and put it in my backpack. Several days later, I was emptying my backpack, cleaning it out, and I found the check, and I put the check in your black wallet. *Sorry* mommy. But I gave the check back to you, mommy. Did you find it, mommy? I know it was a check because daddy told me the bank would give him those little papers, and they were called "bank checks." Mommy, remember that before giving it to you, my *daddy* wrote letters and the number 40. Mommy, I liked that paper, it was pretty.**

1 **WITNESSES**

2 The State intends to call approximately 40 witnesses in its case-in-chief. They can be grouped into  
3 these general categories: civilian witnesses, custodians of records and foundation witnesses for videos, law  
4 enforcement, and forensic or medical examiners. The state will file a witness list contemporaneously with  
5 this trial memorandum.

6 **EVIDENTIARY ISSUES AND MOTIONS IN LIMINE**

7 The Court has ruled on six separate motions to suppress regarding the defendant’s statements and  
8 evidence obtained via search warrants in this matter.

9 The Court has reserved ruling on the remaining motions in limine, including motions related to  
10 prior bad acts, such as the sex abuse allegations and Defendant’s prior burglary conviction, information  
11 related to the divorce, and motions regarding the \$40,000 check. The defense has also moved to exclude  
12 scientific evidence.

13 The state rests on its previously-submitted briefing on these issues and asks the court to consider  
14 the factual background included in this memorandum as supplemental factual background for said motions.

15 **EXHIBITS**

16 The state will file an Exhibit List contemporaneously with this trial memorandum. The state  
17 reserves the right to add additional exhibits prior to and during trial as may be appropriate.

18 In accordance with the Court’s previous request, the state will load every piece of video evidence  
19 onto separate thumb drives to provide to the jury. The state will also provide defense counsel and the court  
20 with a copy of all exhibits on a separate thumb drive, with each exhibit identified in its file name.

21 **JURY INSTRUCTIONS**

22 The prosecution will submit proposed jury instructions consistent with the UCJI. At this time, the  
23 state does not intend to offer any special jury instructions.  
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1 **CONCLUSION**

2 The state will appear at the April 3, 2026 Trial Readiness Conference and report that it is prepared  
3 to proceed with trial starting on April 6, 2026.  
4

5 Dated this 31st day of March 2026.  
6

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8 Gavin W. Bruce, OSB#113384

9 Senior Assistant Attorney General

10 Oregon Department of Justice  
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CERTIFICATE OF SERVICE

I hereby certify that I served the within trial memorandum by electronically transmitting or hand-delivering a certified true copy thereof, certified by me as such, addressed to:


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Dated this 31<sup>st</sup> day of March 2026.

  
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