

KENT, SC

SUPERIOR COURT

STATE OF RHODE ISLAND

vs.

C.A. No. K1/09-xxxxxx

:
:
:
:

John DOE

**STATE'S ANSWER TO DEFENDANT'S
MOTION DISCOVERY AND INSPECTION**

Now comes the State of Rhode Island, by and through its attorneys, Patrick C. Lynch, Attorney General, and Jane Doe, Special Assistant Attorney General, in answer to Defendant's Request for Discovery and Inspection and answers as follows:

1. For a summary of oral or written statement(s) made by the defendant, please refer to the following, copies of which are attached hereto:

- Police narrative from Ptlm. dated 9-19-2008.
- Police narrative report from Det. dated 11-19-2008.
- Police narrative report from Sgt. dated 9-19-2008.
- Witness statement from Nathan Bruce dated 9-19-2008.
- Witness statement from Paul Allard dated 9-19-2008.
- Witness statement from Colin Brown dated 9-19-2008.
- Witness statement from Tristan Heart dated 9-19-2008.
- Signed Miranda rights, signed consent to search forms, and witness statement from the defendant, John Doe dates 11-18-2008 and 11-19-2008.
- Witness statement from Jason Rebello dated 9-19-2008.
- Police narrative report from Ptlm. dated 9-19-2008.
- Police narrative report from Ptlm. dated 11-18-2008.

2. The defendant did not testify before a Grand Jury.

3. There is no Co-Defendant in this matter.
4. Please refer to the following, copies of which are attached hereto:
 - Warwick Police Department reports 08-4432OF/08-3454AR.
 - Signed Miranda rights and witness statements.
 - Photographs of seized evidence.
 - Photo line up array package.
 - Photographs taken of the injuries sustained by the victim.
 - Mugshot profile of the defendant.
 - Cranston Police Department reports 08-59659OF/08-59721AR.

Please note that this list of evidence viewed is not intended to be an exclusive list of the evidence that the State will present at trial but contains that which defense has requested to view. In addition to the evidence viewed, the State has provided defendant a list of documents, recording, and/or other evidence it will present at the trial through its answer/s to defendant's request for discovery.

For an appointment to view tangible evidence in this matter, please contact the Paralegal at 222-2424.

5. None known to the State at this time.
6. The State does not intend to call expert witnesses at this time. Should the State call expert witnesses, the State will provide the defendant with the curriculum vitae and/or summary of the witnesses expected testimony.

Any witness and/or testimony before the Grand Jury not listed below are incorporated herein. To obtain a Grand Jury CD in this matter, please contact the Paralegal at 222-2424.

7&8. The following may be called to testify as witnesses for the State, copies of which are attached hereto:

-Ptlm., Warwick Police Department, will be expected to testify consistently with his narrative report dated 9-19-2008.

-Det., Warwick Police Department, will be expected to testify consistently with the following:

1. His narrative reports dated 9-19-2008 and 11-11-2008.
2. His grand jury testimony dated 1-27-2009.

-Lt., Warwick Police Department, will be expected to testify consistently with the following:

1. His narrative reported dated 11-19-2008.
2. Affidavit and arrest warrant.

-Sgt., Warwick Police Department, will be expected to testify consistently with the following:

1. His narrative reported dated 9-19-2008.
2. His grand jury testimony dated 1-27-2008.

-Det., Warwick Police Department, will be expected to testify consistently with his narrative report dated 9-19-2008.

-Civilian, Warwick Police Department, will be expected to testify consistently with his narrative report fated 9-19-2008.

-Nathan Bruce, 16 Diamond Hill Rd, Lincoln, RI, Will be expected to testify consistently with the following:

1. His witness statements dated 9-19-2008 and 11-12-2008.

2. Photo lineup instructions dated 11-12-2008.
3. Photo line up.
4. His grand jury testimony dated 1-27-2009.

-Paul Allard, 201 Vivian Ave, Providence, RI, will be expected to testify consistently with the following:

1. His witness statement dated 9-19-2008.
2. His grand jury testimony dated 1-27-2009.

-Colin Brown 14 Pineswamp hill, Pawtucket, RI, will be expected to testify consistently with the following:

1. His witness statement dated 9-19-2008.
2. His grand jury testimony dated 1-27-2009.

-Meghan Tweedie, 27 Evertin Lane, Kingston, RI, will be expected to testify consistently with her witness statement dated 9-19-2008.

-John Doe, 2 First Ave, Kingston, RI, will be expected to testify consistently with the following:

1. His witness statement dated 9-19-2008.
2. Consent to fingerprint and/or photograph.
3. Consent to search motor vehicle.

-Ptlm., Cranston Police Department, will be expected to testify consistently with his narrative report dated 9-19-2008.

9. Please see attached criminal record(s). Please note this response does not include the existence, if any, of Juvenile records on the defendant or the witnesses listed above.

Should the defendant seek this information, the Family Court has the appropriate procedures.

10. Please refer to the following copies of which are attached hereto.

- Affidavit and arrest warrant.

STATE OF RHODE ISLAND
Respectfully,

PATRICK C. LYNCH
ATTORNEY GENERAL

By _____
Jane DOE
Special Assistant Attorney General

CERTIFICAITON

I hereby certify that a true copy of the within State's Answer to Defendant's Motion for Discovery and Inspection was mailed, postage prepaid to John Smith, 222 Center Street, Providence, RI 02903 on the 2nd day of April, 2012