

**[OFFICE NAME]**

State's Attorney's Office  
[Address]

Dear State's Attorney:

In connection with the above case, please provide the following:

1. A list of the names and addresses of all witnesses now known to the State or which will become known to the State;
2. Any and all written and/or recorded statements of all witnesses within the possession or control of the State;
3. Any and all written or recorded statements and the substance of any oral statements made by the defendant or a co-defendant;
4. Any reports or statements or experts made in connection with the above case, including the results of physical or mental examination and of scientific tests, experiments or comparisons;
5. Any books, papers, documents, photographs (including motion pictures and video tapes), or tangible objects, buildings or places or copies or portions thereof, which are material to the preparation of the defense or which the State intends to use in a hearing or trial of this case or which were obtained from or belonged to the defendant;
6. The names and addresses of all witnesses whom the State intends to call as witnesses at a hearing or trial in this case, together with any record of prior criminal convictions of any such witnesses, not only in the State of Vermont but throughout the United States;
7. Any record of prior criminal convictions of defendant;
8. Whether electronic surveillance of defendant, any co-defendant or any co-conspirator, or of his or her premises, has occurred or of those premises, places or persons to which defendant has standing to object;
9. Any other material or information not protected from disclosure by being attorney work product or an informant's identity (except as provided by V.R.E. 509(c)), that is necessary to the preparation of the defense;
10. Any material or information within the possession or control of the State which tends to negate the guilt of the defendant as to the offense charged or would tend to reduce his or her punishment therefor;
11. Any material or information in the possession or control of the staff of the State's Attorney or of any others participating in the investigation or evaluation of the case, and who either regularly report, or with reference to this particular case report of the Office of the State's Attorney where such material and information is material and relevant to the prosecution of the defendant or if not material and relevant, may lead to the discovery of material and relevant information and

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evidence relating to the prosecution of the defendant and such material is not precluded from discovery to defendant under the provisions of Rule 16(d)(1);

12. Any evidence from informers, favorable or unfavorable to the defendant together with names and addresses of such informants acknowledgement of any promises, threats or grants of immunity offered to such informants by the State's Attorney, members of his or her staff, or those who regularly report, or with reference to this particular case, report to the Office of the State's Attorney;

13. Whether there has been any search and/or seizure of any materials belonging to co-defendant or co-conspirator of his or her premises, or of person, places or premises to which defendant has standing to object;

14. Whether there has been any search and/or seizure of any materials belong to defendant or of his or her premises or of persons, places or premises to which defendant has standing to object;

15. All material, information and reports, whenever such material becomes known to the State's Attorney, and whenever it would have become known to the State's Attorney through the use of his or her reasonable diligence;

16. All victim advocate's communications with alleged victims and or witnesses;

17. Any police log or other electronic data regarding the incident alleged in the above case.

18. All materials and information, in any form including electronic, regarding any current internal investigation, disciplinary proceeding or other proceeding regarding improper conduct of any and all law enforcement personnel or witnesses, including but not limited to police officers, state troopers and 911 operators/dispatchers, who are involved in the investigation or prosecution of this case.

19. All materials and information, in any form including electronic, regarding any past internal investigation, disciplinary proceeding or other proceeding regarding improper conduct of any and all law enforcement personnel or witnesses, including but not limited to police officers, state troopers and 911 operators/dispatchers, that resulted in a finding of improper conduct.

20. In addition, the defense hereby adopts all state witnesses, whether listed on the state's witness list or named anywhere in discovery.

Thank you.

Sincerely,