

STATE OF MARYLAND

\*

IN THE

Plaintiff

\*

CIRCUIT COURT

v.

\*

FOR

EDWARD NERO

\*

BALTIMORE CITY

Defendant

\*

Case No. 115141033

\* \* \* \* \*

**DEFENDANT'S DISCOVERY DISCLOSURES**

Defendant Officer Edward Nero, by undersigned counsel, hereby discloses the following information in accordance with Maryland Rule 4-263(e). Defendant reserves the right to supplement and revise these initial discovery disclosures.

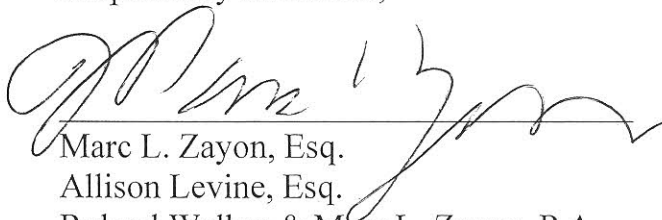
**I. DEFENSE WITNESSES PURSUANT TO RULE 4-263(e)(1)**

The witnesses for the Defendant include any individual identified by the State in its discovery disclosures, as well as any individual mentioned in the document(s) attached to the Defendant's discovery disclosures. Defendant also plans to call at trial all individuals who participated in the independent investigation conducted by the State's Attorney's Office, the Baltimore Police Department investigation, as well as all individuals responsible for training Baltimore Police Department officers. Defendant reserves the right to call any of the witnesses or individuals mentioned or referenced in the discovery produced by the State's Attorney's Office. Additionally, the Defendant intends to call upon the following witnesses at the trial of the above-captioned case:

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2016 JAN 22 P 12:34  
CRIMINAL DIVISION

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2016 JAN 22 P 12:03  
CRIMINAL DIVISION

Respectfully submitted,



Marc L. Zayon, Esq.

Allison Levine, Esq.

Roland Walker & Marc L. Zayon, P.A.

201 N. Charles Street, Suite 1700

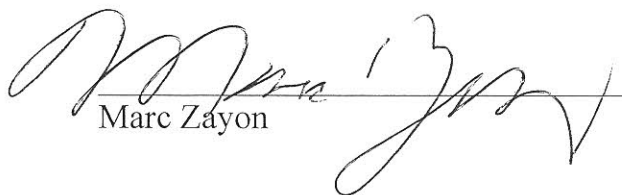
Baltimore, Maryland 21201

Phone: (410) 727-3701

*Counsel for Officer Edward Nero*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Defendant's Discovery Disclosures was hand-delivered with exhibits, postage pre-paid to the Office of the State's Attorney for Baltimore City, 120 East Baltimore Street, Baltimore, Maryland 21202.



Marc Zayon