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May 27, 2016

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Matthew B. Fraling, III
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Dear Counsel,

Attached please find the following disclosures from the State:

- 1) Seatbelt Inspections email sent to "ALL" Baltimore Police distribution group, unopened by Officer Goodson
- 2) Internal Affairs records for Officer Goodson, and related public documents
- 3) Central Booking Intake Center records for Freddie Gray on 12/30/2014

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Akhtar", written over a faint, illegible background.

Sarah Akhtar
Assistant State's Attorney
120 East Baltimore Street
Baltimore, MD 21202
(443) 984-6217

Amy E. Askew

From: Andrew Jay Graham
Sent: Friday, June 03, 2016 4:26 PM
To: Amy E. Askew
Subject: FW: State v. Goodson
Attachments: Goodson Locker - Memo.pdf

Andrew Jay Graham

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From: Michael Fiorenza [<mailto:mfiorenza@stattorney.org>]
Sent: Friday, June 03, 2016 3:38 PM
To: Matt Fraling; Andrew Jay Graham
Cc: Michael Schatzow
Subject: State v. Goodson

Good Afternoon:

Attached please find a document from your client's locker that the State intends to introduce into evidence at trial.

Best,

Michael C. Fiorenza

Office of the State's Attorney for Baltimore City
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Amy E. Askew

From: Sarah Akhtar <SAkhtar@statorney.org>
Sent: Sunday, June 05, 2016 4:31 PM
To: Andrew Jay Graham; Amy E. Askew; Matthew.fraling@mdlobbyist.com
Cc: Michael Schatzow
Subject: CBIF stats
Attachments: DOC035.pdf

Dear Counsel,

Attached please find 2015 CBIF statistics.

Sincerely,

Sarah Akhtar
Assistant State's Attorney
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120 E. Baltimore Street, 9th Floor
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IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

STATE OF MARYLAND

vs.

Case Numbers:

CAESAR GOODSON,
EDWARD NERO,
GARRETT MILLER,
BRIAN RICE,
ALICIA WHITE,
WILLIAM PORTER,

115141032
115141033
115141034
115141035
115141036
115141037

DEFENDANTS.

REPORTER'S OFFICIAL TRANSCRIPT OF PROCEEDINGS

(Motions' Hearing - Afternoon Session)

Baltimore, Maryland

Thursday, September 10, 2015

BEFORE:

HONORABLE BARRY G. WILLIAMS, Associate Judge

* Proceedings Digitally Recorded *

Transcribed by:
Patricia Trikeriotis
Chief Court Reporter
Circuit Court for Baltimore City
111 N. Calvert Street
Suite 515, Courthouse East
Baltimore, Maryland 21202



APPEARANCES:

For the State:

MICHAEL SCHATZOW, ESQUIRE

JANICE BLEDSOE, ESQUIRE

MATTHEW PILLION, ESQUIRE

JOHN BUTLER, ESQUIRE

For the Defendant Caesar Goodson:

MATTHEW FRALING, III, ESQUIRE

ANDREW GRAHAM, ESQUIRE

For the Defendant Brian Rice:

MICHAEL BELSKY, ESQUIRE

CHAZ BALL, ESQUIRE

For the Defendant Alicia White:

IVAN BATES, ESQUIRE

TONY GARCIA, ESQUIRE

For the Defendant Garrett Miller:

CATHERINE FLYNN, ESQUIRE

BRANDON MEAD, ESQUIRE

For the Defendant William Porter:

JOSEPH MURTHA, ESQUIRE

For the Defendant Edward Nero:

MARC ZAYON, ESQUIRE

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A F T E R N O O N S E S S I O N

(2:10 p.m.)

THE CLERK: All rise.

Circuit Court for Baltimore City, Part 31,
resuming its session, the Honorable Barry G. Williams
presiding.

THE COURT: Thank you.

Everyone please be seated.

Let's re-call the case for the record, please.

MR. SCHATZOW: Good afternoon, Your Honor.

Michael Schatzow, Baltimore City State's
Attorney, on behalf of the State.

Calling the cases of State of Maryland versus
Caesar Goodson, Number 115141032; State of Maryland
versus Edward Nero, Number 115141033; State of Maryland
versus Derrick Miller, Number 115141034; State of
Maryland versus Brian Rice, Number 115141035; State of
Maryland versus Alicia White, Number 115141036; and State
of Maryland versus William Porter, Number 115141037.

Your Honor, with me at counsel table is Deputy
State's Attorney Janice Bledsoe and Assistant State's
Attorneys Matthew Pillion and John Butler. We're here
today, Your Honor, on four subpoena issues, and Deputy
Bledsoe will be handling these matters for the State this
afternoon.

1 THE COURT: All right.

2 MR. FRALING: Good afternoon, Your Honor.

3 Matthew Fraling on behalf of Mr. Goodson.

4 MR. GRAHAM: And Andrew Graham on behalf of

5 Officer Goodson.

6 MR. BELSKY: Good afternoon, Your Honor.

7 Michael Belsky on behalf of Lieutenant Brian

8 Rice.

9 MR. BALL: Good afternoon, Your Honor.

10 Chaz Ball on behalf of Lieutenant Rice.

11 MR. GARCIA: Tony Garcia and Ivan Bates on

12 behalf of Alicia White.

13 MR. MURTHA: Joseph Murtha on behalf of William

14 Porter, Your Honor.

15 MS. FLYNN: Catherine Flynn on behalf of

16 Officer Miller, Your Honor.

17 MR. MEAD: Good afternoon, Your Honor.

18 Brandon Mead, also on behalf of Officer Miller.

19 MR. ZAYON: And Marc Zayon on behalf of Officer

20 Nero.

21 THE COURT: All right. Counsel, where are we

22 as far as the motions? I'm told that you -- the parties

23 were discussing some things. Can anyone get me up to

24 date as to where we are? It doesn't matter who.

25 MS. FLYNN: Your Honor, on behalf of the

1 defendants, I can indicate that there's been some
2 resolution, and some things that I think we can postpone
3 trying to resolve.

4 THE COURT: Okay.

5 MS. FLYNN: We had issued a Motion for Subpoena
6 for documents from the Baltimore Police Department
7 Academy Training Division.

8 THE COURT: Okay.

9 MS. FLYNN: Ms. Bledsoe called me yesterday and
10 indicated that the Academy Training Division had provided
11 to the State's Attorney's Office all of the documents
12 that would be relevant to that request regarding each of
13 our clients individually.

14 THE COURT: Okay.

15 MS. FLYNN: I did have an opportunity to pick
16 up the information provided regarding my client. There
17 are confidential personnel matters included in the
18 discovery, so I was -- I only picked up the discovery for
19 my client.

20 THE COURT: Right.

21 MS. FLYNN: But upon reviewing that
22 information, it is, frankly, missing a lot of information
23 regarding the training that might have been provided to
24 my officer -- my client at the Academy.

25 However, I understand that that is all of the

1 information that was provided to the State's Attorney's
2 Office.

3 Ms. Bledsoe indicated to me that she would give
4 me the name and contact information for the custodian of
5 records or whoever made that information available to the
6 State's Attorney's Office in order to follow up.

7 I can't speak for what was provided -- I assume
8 it's similar for each of the officers. But there's
9 basically no curriculum included in what information was
10 provided during the course of an academy, in attending
11 the Academy or any in-service training information, et
12 cetera. And I did confirm with my client that he's had
13 in-service training, but there's nothing in the file to
14 indicate that -- to that effect.

15 THE COURT: Okay.

16 MS. FLYNN: So I am going to follow up on that,
17 and I will contact the State or the appropriate officials
18 at the police department if I can't get to the bottom of
19 it.

20 THE COURT: Okay. So that is your -- let's
21 see. Motion for Subpoena for Tangible Evidence of
22 Baltimore City Police Department Training Academy;
23 correct? That's the one you're --

24 MS. FLYNN: Yes.

25 THE COURT: -- referring to?

1 MS. FLYNN: Yes.

2 THE COURT: Okay. So let's make sure I know
3 what we're talking about here.

4 All right. So that particular subpoena -- I'll
5 make a ruling on that later. I just want to make sure
6 we're talking about the same one. Okay.

7 Go ahead.

8 MS. FLYNN: I also filed a Motion for Subpoena
9 for Tangible Evidence from the Office of the Chief
10 Medical Examiner, requesting the entire file from the
11 Medical Examiner's Office regarding this case.

12 Ms. Bledsoe indicated to me today that she did
13 speak to, I assume it was Dr. Allen, at the Medical
14 Examiner's Office, who indicated that everything that had
15 been provided to the State's Attorney's Office and has
16 been provided to the defense, that that's all that they
17 have in their possession.

18 I have requested notes, any investigatory file,
19 any documents produced by anybody else within the Medical
20 Examiner's Office. But evidently, according to Dr.
21 Allen, that doesn't exist.

22 The only thing that had not been turned over in
23 discovery were the pathology slides. And Ms. Bledsoe
24 indicated that they can make those directly available to
25 our expert witnesses once we make a specific request for

1 what they're looking for in those slides.

2 THE COURT: Okay.

3 MS. FLYNN: So I would no longer be seeking
4 that subpoena because I think we've been --

5 THE COURT: So for that particular subpoena, do
6 you want to withdraw it, or do you just want the Court to
7 rule on it? It doesn't matter to me.

8 MS. FLYNN: At this point, I'll withdraw it.

9 THE COURT: Okay. That's fine. Then I don't
10 have to make a ruling on it.

11 MS. FLYNN: Based on the State's
12 representation.

13 THE COURT: That's fine. So that's withdrawn
14 for the Subpoena to the Medical Examiner's Office.

15 MS. FLYNN: Yes.

16 THE COURT: Okay.

17 THE COURT: And to make sure we're clear.
18 You -- did you issue the subpoena yourself, or was that
19 for everyone? I'm trying to remember which one is that.

20 MS. FLYNN: I --

21 THE COURT: I think yours was just that -- for
22 you.

23 MS. FLYNN: I issued it on behalf of Officer
24 Miller.

25 THE COURT: Okay. So that's withdrawn.

1 MS. FLYNN: Your Honor, I also issued a Motion
2 for Subpoena for Tangible Evidence from Central Booking,
3 asking for the entire base file and medical records of
4 Freddie Gray if and when he was ever detained at that
5 facility.

6 Ms. Bledsoe indicated to me that she had spoken
7 to Central Booking and that they claimed that they had
8 sent something to me in response to this.

9 I haven't received anything, but maybe it was
10 put in the mail yesterday. I don't know. And so I will
11 ask to withdraw that right now --

12 THE COURT: Okay.

13 MS. FLYNN: -- depending on what is sent to me.

14 THE COURT: That's fine.

15 MS. FLYNN: I simply have to -- once I review
16 what I receive, I may have to make another request.

17 THE COURT: A more tailored request?

18 MS. FLYNN: Yes.

19 THE COURT: Okay.

20 MS. FLYNN: Once I see what they are actually
21 providing.

22 They didn't call me and tell me they were
23 sending me anything.

24 THE COURT: That's fine.

25 MS. FLYNN: But I will wait until I receive it.

1 THE COURT: All right. So that's going to be
2 withdrawn at this time; correct?

3 MS. FLYNN: Yes.

4 THE COURT: You said yes?

5 MS. FLYNN: Yes.

6 THE COURT: Okay. All right.

7 MS. FLYNN: So the remaining Motions for
8 Subpoenas for Tangible Evidence are both directed to the
9 State's Attorney's Office for two different purposes.

10 One was directed to the State's Attorney's
11 Office to provide information regarding documents, the
12 names of people, any curriculum, any PowerPoint
13 presentations that are in the custody of the State's
14 Attorney's Office that have been utilized in providing
15 training at the Police Academy.

16 The reason for that is it's my understanding
17 that members of the State's Attorney's Office, at
18 different times, are responsible for appearing at the
19 Police Academy and teaching the legal portions of the
20 trainings that are provided to the Academy members.

21 My client indicated to me that Ms. Michelle
22 Martin, who is no longer at the State's Attorney's
23 Office, was there for 40 hours providing the legal
24 training that they received at the Academy.

25 Another of the defendants indicated that

1 Michelle Martin and Tony Gioia, who is still at the
2 State's Attorney's Office, appeared at the Academy and
3 provided training regarding legal issues.

4 Now, Michelle Martin is now at the Attorney
5 General's Office, and so I'm not sure what she has in her
6 possession. But we are asking for a subpoena in order to
7 request that the State's Attorney's Office provide to the
8 defense whatever documents and curriculum, PowerPoints
9 that are relied upon when a member of their office goes
10 to the Academy to train officers regarding the law.

11 Now, it's my understanding that there's a 40-
12 hour portion of legal training that is provided. And so
13 I imagine that's done in five days. And that there are
14 handouts given; there are, as I said, PowerPoint
15 presentations relied on.

16 Now frankly, Your Honor, I sort of anticipated
17 getting that in the information that was provided by the
18 Police Academy, but there was nothing in the documents
19 that were provided by the Police Academy, but for one, I
20 believe, 40-page curriculum that was relied upon for a
21 24-hour training for -- medical training for police
22 officers.

23 And I confirmed with my client that that was a
24 portion of the training at the Academy, but he indicated
25 that they had at least 40 hours on legal training. And

1 that legal training -- I'm not sure it's always provided
2 by members of the State's Attorney's Office, but it is
3 certainly sometimes provided by the members of the
4 State's Attorney's Office.

5 As I said, it's my understanding that Mr. Gioia
6 has provided that training, as well as Michelle Martin.
7 I know Ms. Phelps is the head of training now. I'm not
8 sure what the -- if there's a specific plan or schedule
9 for State's Attorneys to provide that information at the
10 Academy, but I know it has been done.

11 And the request that I made specifically
12 requested this documentation from January 1st until 2012.
13 My client attended the Academy in April of 2012, but I
14 was trying to account for some other defendants.

15 THE COURT: You said April 2012 is when your
16 client --

17 MS. FLYNN: Yes.

18 THE COURT: Okay.

19 MS. FLYNN: And while I don't know if the
20 State's Attorney's Office preserves that information, it
21 is my understanding that there's -- I suspect there's a
22 set kind of information that's provided to the trainees
23 that is the same from Academy class to Academy class.

24 And in that it's specifically provided by
25 members of the State's Attorney's Office, the State's

1 Attorney's Office would be in an unique position to
2 provide the information about who was responsible for
3 providing this training and what documents they relied on
4 to provide this training.

5 THE COURT: And when you're saying training,
6 you're talking about legal training --

7 MS. FLYNN: Yes.

8 THE COURT: -- specifically?

9 MS. FLYNN: Yes.

10 THE COURT: Okay. Go ahead.

11 MS. FLYNN: The other -- and the last remaining
12 Motion for Subpoena for Tangible Evidence was directed to
13 the State's Attorney's Office regarding the investigatory
14 file for the efforts that the State's Attorney's Office
15 made in investigating the matters in this case.

16 And I specifically tailored that request to the
17 dates of April 12th through May 1st, which is when the
18 defendants were charged.

19 It's the defendants' position that up until the
20 charging of the defendants, the State's Attorney's Office
21 was acting in the position of an investigatory -- as
22 investigators, not dissimilar to the position of the
23 police department.

24 And only after they were charged, would they be
25 in the position of being advocates or prosecutors or

1 preparing for litigation.

2 But up until the moment of making the decision
3 about charging the defendants, it was stated that they
4 conducted an independent investigation, and that -- and
5 that investigation would not be protected by any claim of
6 work product.

7 The State's Attorney's Office, by opting to
8 conduct that investigation, is in the exact same position
9 as law enforcement agency would be when they conduct an
10 investigation prior to charging.

11 Now, we have been provided the Baltimore Police
12 Department investigatory file, which includes reams and
13 reams of documents and notes taken by investigators and
14 witness statements and reports, et cetera.

15 From the State's Attorney's Office, what we
16 received, pursuant to their investigation, was a series
17 of photographs, and there were four videos provided. And
18 these are videos of interviews with people in the
19 community. What is difficult is that whoever is
20 conducting the interview doesn't identify themselves, but
21 I'm assuming they're members of the State's Attorney's
22 Office investigatory team, nor are the people that are
23 being interviewed identified, nor are the dates specified
24 about when these interviews took place.

25 In fact, one of the people that seems to be

1 conducting the interview has a pad of paper in his hand
2 while this is going on. So that suggests to me there may
3 have been notes taken during the course of the interview.

4 The only documents that we received so far from
5 the State's Attorney's Office regarding their
6 investigation were, I believe, two pages that describe
7 two witness interviews; and then a series of addresses
8 listed where they were doing a neighborhood canvas,
9 obviously, and knocking on doors, and nobody was home.

10 We did receive one audiotape of a witness
11 statement that is documented in this two-page document
12 that was provided by the State's Attorney's Office, but
13 nothing else.

14 And I believe the State's Attorney position
15 would be that this was part of work product. But it is
16 our position that until the defendants were charged, they
17 were standing in the position, as I said, of the
18 investigatory agency and are obligated to provide their
19 investigatory file.

20 Certainly, if I had filed a subpoena for the
21 homicide detective's investigatory file, they would be
22 obligated to provide it to me.

23 Now, I understand the State has an independent
24 obligation to comply with the Rules of Discovery. But
25 the Rules of Discovery do not preclude the defense from

1 conducting their own investigation. And so there's
2 nothing to prevent us from independently subpoenaing
3 members of the Baltimore City Police Department and
4 independently requesting for them to produce their files.
5 That's simply the request that we're making here.

6 THE COURT: Well, what about the independent
7 request from the State's Attorney's Office? Why would
8 that not be a discovery violation, if a violation at all,
9 as opposed to you seeking a subpoena?

10 MS. FLYNN: You mean their failure to provide
11 anything?

12 THE COURT: That's why I said if it's in
13 violation.

14 MS. FLYNN: Well, except they have provided
15 what they claimed consists of their investigation. And
16 so as an independent measure, we are seeking to protect
17 our ability to investigate this case in directly
18 subpoenaing that information. There's nothing about the
19 Rules of Discovery that preclude us from doing that.

20 And in that, we're simply asking for, and I
21 listed in the proposed subpoena, all of the information
22 that would have been generated and the documents that
23 would have been generated during the course of the
24 investigation.

25 I'm not asking for anything that would go

1 beyond the boundaries of the investigation that would go
2 into the preparing for trial or the advocacy portion of
3 the State's Attorney's role in this case. We're
4 specifically limiting our request to that investigation.

5 THE COURT: Okay. Anything else?

6 MS. FLYNN: No, Your Honor.

7 THE COURT: Hold on one second. Okay. There
8 we go there.

9 MR. BELSKY: Your Honor?

10 Your Honor, just very briefly --

11 THE COURT: Mr. Belsky.

12 THE COURT: -- procedurally, on behalf of
13 Lieutenant Brian Rice, I'd like to adopt the subpoena and
14 the arguments put forth by Ms. Flynn. We're trying to
15 not be duplicitous. And the alternative would be that we
16 each start issuing subpoenas and having multiple motions
17 to quash.

18 So if it's okay with the State and the Court, I
19 would just like to adopt those arguments on behalf of my
20 client. And I'm sure each of my colleagues here would
21 ask the same.

22 THE COURT: Any objection from the State?

23 MR. FRALING: Your Honor --

24 THE COURT: Well --

25 Any objection from the State before we move on?

1 MS. BLEDSOE: No, Your Honor.
2 THE COURT: Okay.
3 I'll hear from each person then for the record
4 then.
5 MR. FRALING: Most respectfully, Your Honor, on
6 behalf --
7 THE COURT: Wait. I'm sorry.
8 I thought you said --
9 MS. BLEDSOE: I said no objection.
10 THE COURT: That's what I thought you said.
11 MS. BLEDSOE: Yeah, okay.
12 THE COURT: That's what I thought you said.
13 MS. BLEDSOE: Yeah. No.
14 THE COURT: That's what I thought you said.
15 So I was to hear from each defendant on the
16 record.
17 MS. BLEDSOE: Okay.
18 THE COURT: Thank you.
19 MR. FRALING: Your Honor, most respectfully, on
20 behalf of Mr. Goodson, we would join in the request.
21 MR. GARCIA: On behalf of Alicia White, we
22 would join.
23 MR. MURTHA: On behalf of Officer Porter, he
24 also joins, Your Honor.
25 MR. ZAYON: And on behalf of Officer Nero, we,

1 too, would join.

2 THE COURT: All right. Very well. It's one of
3 the issues I had anyway. All right.

4 I'll hear from you.

5 MS. BLEDSOE: Thank you, Your Honor.

6 Just a couple pieces of information, just for
7 clarification.

8 THE COURT: Okay.

9 MS. BLEDSOE: The subpoena for CBIF, we
10 actually had a conversation -- Mr. Butler had a
11 conversation --

12 THE COURT: Well, not -- let me ask you to --
13 I'm not being funny at all. Do you need to discuss that
14 one at this point since it's withdrawn, or is there
15 something that you want the Court to know?

16 MS. BLEDSOE: I just -- yeah. I just want to
17 make sure there's no misrepresentation.

18 THE COURT: Okay.

19 MS. BLEDSOE: We did contact CBIF, and we were
20 told that not -- some documents were sent, and it was a
21 base file. So I'm not making any representations that
22 Mr. Gray's medical records were sent or what was in the
23 file. We were just told by a clerk at CBIF that
24 something from --

25 THE COURT: That's basically what she said.

1 MS. BLEDSOE: Yeah.

2 THE COURT: That's fine.

3 And she said she'll look through, and the
4 others will get it, I assume, when -- if it goes to them.

5 Was it for everyone? I'm just --

6 MS. BLEDSOE: No. It was just for --

7 THE COURT: Now, here that's part of the
8 problem. You've all joined in, but you all didn't ask
9 for it. So are the documents going to all of them?

10 MS. BLEDSOE: Right. But I'm sure what's going
11 to happen is Ms. Flynn is going to Xerox them and give
12 them -- provide --

13 MS. FLYNN: Only if they ask really nicely.

14 (Laughter.)

15 THE COURT: Only if they ask -- okay. Well,
16 we'll see about that then, won't we?

17 MS. FLYNN: Yes.

18 THE COURT: All right. Not a problem. Okay.

19 MS. BLEDSOE: Okay. In terms of Ms. Flynn's
20 request for discovery on State's Attorney's Office, we
21 start our argument, our legal argument, Your Honor, based
22 on a different, I think, legal principle than the defense
23 believes they have.

24 There is no general equivalent rule of civil
25 discovery in criminal law. So we start -- the State

1 starts with premise that the discovery, and what you're
2 allowed to get through discovery, is clearly defined --

3 THE COURT: Excuse me one second.

4 MS. BLEDSOE: Sure, Your Honor.

5 (Brief pause.)

6 THE COURT: You may proceed.

7 MS. BLEDSOE: So there is no general rule, like
8 in civil law, that the defendants have a right to just
9 anything that's relevant in terms of discovery.

10 And there's a good discussion of that --

11 THE COURT: Well, if it's relevant, don't they
12 get it? I mean, that's the word you just used, if it's
13 relevant. If it's not relevant, sure. But --

14 MS. BLEDSOE: No, I'm just saying anything --
15 in the civil rules, anything that's relevant that might
16 lead to discovery is a much broader standard than what is
17 allowed here in the Discovery Rules. And there's a big
18 difference between what's allowed civilly and what's
19 allowed criminally.

20 And so I think the defense starts out with sort
21 of this broad conception that they're allowed to get
22 anything that either the State's Attorney's Office has,
23 except for obviously work product, which is really not
24 the case. But --

25 THE COURT: But that's different. You said

1 anything that's relevant.

2 MS. BLEDSOE: Well -- no, Your Honor. They
3 don't get anything that's relevant because it might be
4 relevant to a fact that may not be important to -- to the
5 trial, to proving guilt or innocence.

6 THE COURT: But isn't that to be -- isn't that
7 separate from what comes in at trial, as opposed to what
8 they get to look at for discovery purposes?

9 MS. BLEDSOE: No, I think it is different, and
10 I think it's a different standard.

11 THE COURT: Okay.

12 MS. BLEDSOE: And that's the whole point of
13 saying that there is a difference in criminal law.

14 THE COURT: I agree with that. That's why
15 we're using the four rules.

16 But go ahead.

17 MS. BLEDSOE: Right. That's why we're using
18 the four rules.

19 And it's clear that, although I think that you
20 have a great deal of power --

21 THE COURT: You think so?

22 MS. BLEDSOE: I do think that, Your Honor. For
23 many years, I've thought that.

24 THE COURT: Okay.

25 MS. BLEDSOE: I don't think that you have the

1 power beyond the Rules confer -- beyond Rule 4-263 to
2 order discovery of tangible evidence or documents in the
3 State's possession, except for that which is listed in
4 the Discovery Rules.

5 And we have provided everything that is in the
6 Discovery Rules. And, in fact, if they don't believe
7 that we've provided that, then the Rules dictate what
8 you're supposed to do.

9 And I also don't think that just because they
10 issue a subpoena for tangible evidence, that they're
11 entitled to it. I think that that's what the defense
12 starts as their premise. They are entitled to
13 specifically what is described in the Discovery Rules.
14 And we have completely complied with that, and we
15 continue to comply with that.

16 Many of the pieces of --

17 THE COURT: Well, let me ask you a question.
18 It has been stated many times that the State's Attorney's
19 Office did their own thorough independent investigation.
20 And so based on the request -- the joint request of the
21 defendants to your office, what did you turn over? I
22 don't have that. So what did you turn over, based on
23 that?

24 MS. BLEDSOE: Your Honor, we turned over
25 several videos. We turned over 200 photographs. We