

JACKSON CIRCUIT COURT
CRIMINAL DIVISION
INDICTMENT NO. 92-CR-00010

COMMONWEALTH OF KENTUCKY

PLAINTIFF

VS.

DISCOVERY INVENTORY

LESLIE SMITH

DEFENDANT

Comes now the defendant, by counsel, and tenders the following discovery inventory:

- 1) A copy of the transcript of the grand jury proceedings, consisting of eight pages;
- 2) A police report written by Det. Skip Benton of the Kentucky State Police, consisting of thirteen pages;
- 3) Cabinet of Human Resources' records prepared by Elaine Sexton and Judy Wilson, consisting of eleven pages;
- 4) An opportunity to listen to the tape of a conversation between Det. Skip Benton and Ruby Smith;
- 5) An opportunity to listen to a taped conversation between Det. Benton and Leslie Smith;
- 6) The notes of Mr. Lane Veltkamp consisting of twelve pages;
- 7) An opportunity to watch a video taped conversation between

Lane Veltkamp and Natalie Gabbard;

8) One page of notes written by Mr. Humphrey;

These items and information were provided to the defendant pursuant to a court order. The defendant understands that the above inventory is a complete listing of all those matters within the possession, control, or knowledge of the Commonwealth and its agents and does expect the Commonwealth to object if such is not the case. In addition, the defendant states that a continued request exists for those items of evidence to which he is entitled under Rcr 7.24 and 7.26, up until the time that this case is concluded, and that any discoverable matter will be provided to him when it comes tot he attention of the Commonwealth. The defendant further states his understanding that this includes any and all exculpatory evidence in the possession, control, or knowledge of the Commonwealth. Brady v. Maryland, 373 U.S. 83, 83 S. Ct. 1194, 10 L. Ed.2d 215 (1963).

The defendant understands that this case is to be tried pursuant to KRS 532.055 and KRS 532.025. The defendant understands that the Commonwealth has provided to him all evidence which it intends to introduce pursuant to those statutes.

WHEREFORE, the defendant asks this Court to enforce the foregoing inventory and for any other appropriate relief.

Respectfully submitted,

ERWIN W. LEWIS
ASSISTANT PUBLIC ADVOCATE
201 W WATER STREET



State of North Carolina
General Court of Justice
Defender District 26

SUITE 308
MECKLENBURG COUNTY OFFICE BUILDING
720 EAST FOURTH STREET
CHARLOTTE, N. C. 28202-2894

ISABEL SCOTT DAY
PUBLIC DEFENDER

TEL: 704-347-7870

June 17, 1994

Mr. Barry A. Cook
Assistant District Attorney
Office of the District Attorney
700 East Trade Street, 2nd Floor
Charlotte, North Carolina 28202

VIA COUNTY COURIER MAIL

Re: [REDACTED]

[REDACTED] CRS [REDACTED]

[REDACTED] CRS [REDACTED]

Dear Barry:

In the above-captioned cases, I have received the following discovery from you:

1. A one (1) page typed report entitled "Charlotte Police Department Offense Report." Complaint No. 94-0105213100, Tony Rice, reporting officer.
2. A half ($\frac{1}{2}$) page typed report entitled "Charlotte Police Department Supplement Report," reporting officer, Tony Rice, supplement date, January 5, 1994.
3. A typed report entitled "Charlotte Police Department Suspect/Witness Supplement."
4. A typed paper entitled "Allege Perpetrator - Parent/Caretaker/Perpetrator, Name: [REDACTED] [REDACTED]" The report is nine (9) lines in length.
5. A typed page entitled "[REDACTED], Page 5."
6. A typed page entitled "[REDACTED], Page 6," said page contains five (5) lines of typing.

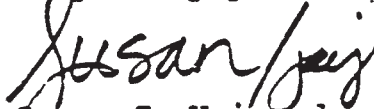
Mr. Barry A. Cook
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7. A zeroxed copy of a photograph of the defendant, [REDACTED]
8. Zeroxed copies of six (6) photographs of defendant [REDACTED] penis.
9. Two (2) copies of a two (2) page report entitled "Teen Health Connection," Date - January 7, 1993.
10. A page entitled "1-11-94," [REDACTED]'s drawing showing warts on [REDACTED] J. Hall.
11. A copy of a consent to search signed by [REDACTED] on February 1, 1994.
12. Five (5) pages of reports from Smith Kline Beecham, Reports were for:
 - a. Culture, Chlamydia
 - b. Culture, Neisseria
 - c. Culture, Chlamydia, Culture, Neisseria
 - d. Rapid Plasma Reagin, Human Immunodeficiency Virus, AB Screen
 - e. Pathology Report

If you feel that you have given me discovery than that which is listed above, I would appreciate it, if you would send me a letter to that effect.

Please call me if you have any questions.

Very truly yours,



Susan J. Weigand
Assistant Public Defender

SJW/jeg