

Hartford Superior Court – Connecticut v. Jonathan Reich
Docket # H14H-CR13-0116876-T

Discovery Motion Filed On **October 8, 2015** at Hartford Superior Court, Received and stamped by the Court Clerk's Office on the last page of the document.

Unanswered To Today's Date **October 14, 2016** 5:01PM
(Over 365 days later and counting that the State of Connecticut has been in violation of the Discovery Request)

DOCKET NO. H14C-CR13-0116876-S	:	SUPERIOR COURT
	:	
STATE OF CONNECTICUT	:	GA 14 - HARTFORD
	:	COMMUNITY COURT
VS.	:	
	:	AT HARTFORD
JONATHAN REICH	:	
	:	OCTOBER 7, 2015

REQUEST FOR DISCOVERY

Pursuant to Connecticut Practice Book § 40-11, the undersigned attorney representing the Defendant, JONATHAN REICH ("Defendant"), in the above-referenced matter, hereby requests that the prosecuting authority forward the following items to the Defendant's attorney, either by mail or by pick up at the prosecutor's office by the undersigned attorney.

1: Copies and physical inspection of the State of Connecticut Superior Court Docket Information pages from the State's Attorney's file and from the Court Clerk's file regarding Docket No. H14C-CR13-0116876-S and Avon Police Department Case No. 1300000765

2: Copies of the Connecticut State Police (State of Connecticut Department of Emergency Services and Public Protection) report "Case CFS13-00000766" and the corresponding written complaint associated with Docket No. H14C-CR13-0116876-S and Avon Police Department Case No. 1300000765

3: Copies of digital recordings of all 911 phone calls placed to the Avon Police Department by Dr. H. Wayne Carver dated 1/30/13 & 1/31/13 associated with Avon Police Case #1300000765 and Docket No. H14C-CR13-0116876-S

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- 4: Copies of digital recordings and outgoing call logs of phone calls placed by Sergeant Jeffrey Gilbert, Detective Jason Reid, or any other officer or appointee assigned or tasked to Avon Police Case #1300000765, to the defendant or his family members between 1/30/13 until 5/20/13. (This includes landlines, personnel-owned phones, and Police Department issued mobile phones)
- 5: A detailed call log, including date, time, and duration of the "daily phone calls" allegedly placed by the defendant to the "family from Durham, CT"
- 6: Copies of digital recordings of 911 phone calls placed to any police agency in the state of Connecticut by "a family from Durham, CT" mentioned in section 8 of the Arrest Warrant Affidavit for Avon Police Case #1300000765.
- 7: Copies of the emails containing the information requested via ex-parte by Detective Jason Reid from TelTech Systems via e-mail on 2/6/13.
- 8: Copies of all ex-parte orders issued to TelTech Systems on 2/6/13, including it's transmission method and log sheet.
- 9: Copies of the Arrest Warrant Affidavit associated with Docket No. H14C-CR13-0116876-S and Avon Police Case #1300000765, including the Incident Report, Narrative, & CAD (Computer Aided Dispatch) Report
- 10: Copies of digital recordings of all 911 phone calls placed to Avon Police Department or to any police agency in the state of Connecticut by Lt. Paul Vance on 1/31/13.
- 11: Copies of digital recordings of 911 phone calls placed to any police agency in the state of Connecticut by "Doctor Carver's secretary" on 2/6/13.

12: Disk that was placed into evidence containing all recorded phone calls (Police Report - Item #7)

13: Subpoena documents that allowed Avon Police Department to access personal records from Metro-PCS (Police Report - Item #11)

14: Any and all communications & directives from the Avon Police Department/State of Connecticut to and from NYPD Detective Kevin Hogan and any and all New York Police agencies.

15: Recordings and records of all Avon Police Department Communications (letters, emails, & phone calls) with: Spoofcard.com, MetroPCS, and TelTech Systems

16: Subpoena and ex-parte documents and orders served to Spoofcard.com, MetroPCS, and TelTech Systems

17: All 'Press Releases' issued by the Avon Police Department or Hartford Community Court including any communications with the Avon Patch Media Outlet (Jessie Sawyer)

18: The name rank, and position of the intake officer or employee of the Connecticut State Police (State of Connecticut Department of Emergency Services and Public Protection) for the complaint from the "family from Durham, CT"

19: Documentation from Judge McNamara giving written consent to the Avon Police Department (Detective Jason Reid or Detective Sergeant Jeffrey Gilbert) to issue a threat of a higher bail than what the original warrant was signed for. (Consent to increase the bail from \$50,000 to \$250,000)

20: Agreement document that states no legal defense fundraising and no social media or websites talking about the case

21: Full identification of the complainants/"victims" referred to as the "family from Durham, CT" in the Arrest Warrant Application

22: In-camera review and complete un-redacted copies of all documents and disk media associated with Connecticut State Police (State of Connecticut Department of Emergency Services and Public Protection) Report CFS No. 1200704559 including Report No. 1200704559-00054069 by Investigator TFC Michael A. Downs (Badge No. 0502) who examined elements of Avon Police Department Case #1300000765 and found that "there does not appear to be a violation of any sort".

23: Copies of all notes from the Bail Commissioner's mandatory pre-arraignment interview

24: Copies of all notes from the Court's human services offices mandatory "needs assessment" after arraignment

25: Copies of all emails, letters, and communications sent to Assistant State's Attorney Thomas J. O'Brien from members of the public and State of Connecticut employees regarding the defendant, Docket No. H14C-CR13-0116876-S, and Avon Police Department Case #1300000765

26: Copies of all emails, letters, and communications sent by Assistant State's Attorney Thomas J. O'Brien to members of the public and State of Connecticut employees regarding the defendant, Docket No. H14C-CR13-0116876-S, and Avon Police

Department Case #1300000765

27: A detailed call log, including phone numbers, date, time, and duration of all phone calls placed into evidence by Detective Jason Reid of the Avon Police Department.

28. Pursuant to Connecticut Practice Book § 41-13 the Defendant requests the names and addresses of all witnesses that the prosecuting authority intends to call in its case-in-chief. The Defendant certifies that no contact will be made with these witnesses except possibly by his attorney and only with prior permission of the prosecuting attorney.

The Defendant,
Jonathan Reich

418789
By Attorney Christopher D. Grotz, Esq.
Juris No. 418789

CERTIFICATION

Sent via Telefax to Hartford Community Court, 80 Washington Street, Hartford, CT 06106 via fax at 860-756-7025 this 7th day of October, 2015.

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