


TO: DISTRICT ATTORNEY'S OFFICE
FROM: BRIAN L. DEIDERICK, CHIEF PUBLIC DEFENDER
RE: _____

OTN NO./ACTION NO. _____

In compliance with the informal request provisions for pre-trial discovery and inspection, Pa. Rule Crim. Proc. 573A, demand is made for the following information and material, Rules 573B (1) (a-g) and 573B(2)(a) and 573B(2)(b):

- a. Any evidence to the accused which is material either to guilt or punishment and which is in the possession of the Attorney for the Commonwealth; this is to include ALL recordings in the possession of the Commonwealth;
- b. Any written confession or inculpatory statement, or the substance of any oral confession or inculpatory statement, and the identity of the person to whom the confession or inculpatory statement was made;
- c. The Defendant's prior criminal record;
- d. The circumstances and results of any identification of the Defendant by voice, photograph, or in person identification;
- e. Any results or reports of scientific tests, expert opinions, and written or recorded reports of polygraph examinations or other physical or mental examinations of the Defendant, that are within the possession or control of the Attorney for the Commonwealth;
- f. Any tangible objects, including documents, photographs, fingerprints or other tangible evidence;
- g. The transcripts and recordings of any electronic surveillance, and the authority by which the said transcripts and recordings were obtained;
- h. The names and addresses of eye witnesses;
- i. All written or recorded statements, and substantially verbatim oral statements, made by co-defendants, and by co-conspirators or accomplices, whether such individuals have been charged or not;
- j. All written or recorded statements, and substantially verbatim oral statements, of eye witnesses the Commonwealth intends to call at trial;
- k. Any information, including the criminal histories of all Commonwealth witnesses, that may affect the reliability of such witnesses; and
- l. The identity of and/or reports authored by an expert(s) the Commonwealth intends to call as a witness(es) in addition to their area of expertise and qualifications and/or Curriculum Vitae.

Served: _____


Brian L. Deiderick
Chief Public Defender for Lebanon County
ID # 85247