

~ex injuria jus non oritur~

Law does not arise from injustice

*an Ancient Roman Legal Principle
& Basis of Modern Western Law
& Modern International Law*

*Randy G Ross of New Haven
by way of pro se representation
a falsis principiis proficisci*

ROSS SHERIFFS V. RANDY G ROSS

ROSS COUNTY

Judge: EDDY

DISCOVERY

ROSS SHERIFFS

v.

RANDY G. ROSS

DISCOVERY

Now, here Come Randy G Ross of New Haven and New Hampshire by way of Pro se Representation making a request/demand for DISCOVERY from the State.

1. Please provide me with all information which may be exculpatory or favorable to the accused (me). Kyles v. Whitley, 115 S.Ct. 1555 (1995); United States v. Bagley, 473 U.S. 667 (1985); Brady v. Maryland 373 U.S. 83 (1963); State v. Laurie 139 N.H. 325 (1995). Regarding this request/demand please not that:

A) This request is not limited to information known to you personally. I specifically request that you question your witnesses, including law enforcement personnel, for information and include their answers in your response. Kyle v. Whitley, supra.

B) This request is not limited to information which has been documented in your file. I specifically request that you provide us with information known to you or your witnesses, regardless of whether it has been recorded in writing or otherwise. Kyles v. Whitley, Id.

C) This request should be answered without regard to whether such evidence would be admissible at any trial or hearing. State v. Laurie, supra. Furthermore, this request should be answered without consideration of the effect such information might have on the outcome of any trial or hearing. Id.

2. Please provide me with all information which may affect the credibility of any potential state witness, including law enforcement personnel, I specifically request:

A) Any information which to show a witness's bias, motive, untruthfulness, untrustworthiness, drug or alcohol use, history of emotional or psychological problems, or bad character.

B) Any information regarding any criminal record of any witness, any criminal investigation of any witness, any plea bargain any witness has, or has had, with any state or federal prosecuting agency, any other promises made by the state or law enforcement to any witness, any witness's probation status, or any compensation or benefit provided to any witness.

C) Any previous unsubstantiated, inconsistent or false information given by any witness.

Kyles v. Whitley, supra; United States v. Bagley, supra; Davis v. Alaska, 415 U.S. 308 (1978); Giglio v. United States, 405 U.S. 150 (1972); State v. Laurie, supra.

3. Please provide me with a list of your trial witnesses and their addresses (we can hold off on any addresses unless requested).

4. Regarding any trial witness who is not an expert please provide me with:

A) Copies of any written statements signed by the witness that pertain to the witness's trial testimony.

B) Any report of other record, reflecting an unsigned statement of a witness which contains the witness's recollection of the events about which he or she will testify.

C) Copies of drafts, reports, notes, memoranda, diagrams, video or audio tapes, maps or any other writing or recording of any information provided by any witness or reflecting the statement of any witness, excluding only “mental impressions” or theories of a prosecuting attorney. This request includes preliminary and “scratch pad” notes of any conversation with any witness.

I request that you take affirmative steps to preserve all of the foregoing evidence and that you instruct you witnesses and law enforcement personnel with your jurisdiction to do the same. Note, that if any notes, reports, ect., are destroyed or otherwise not preserved, the pro se defense will move the court for appropriate relief including, but not limited to, dismissal of the charge or witness preclusion.

5. Regarding any expert who will testify at trial, please provide me with any reports containing their theories, their opinion, or the basis for their theories or opinions.

6. Please provide me with notice of your intent to offer at trial any evidence. I request that you “state the specific purpose for which evidence is offered” and that you “articulate the precise chain of reasoning by which the offered evidence will tend to prove or disprove an issue actually in dispute, without relying upon forbidden inferences of predisposition, character, or propensity” State v. McGlew, 139 N.H. 506 (1995).

7. Please provide me with the following: A copy of records of statements or confessions, signed or unsigned, by the defendant, to any law enforcement officer or his/her agent. A statement as to whether or not the foregoing evidence, or any part thereof, will be offered at the trial. Any criminal record checks you have run on the defendant (me).

8. I request that you preserve any and all physical evidence for my inspection, review, testing and possible use in this case. Please also preserve all documentation of such evidence including crime scene reports, photographs, measurements, notes, test reports or other contemporaneous records of

physical evidence.

9. This letter serves as notice that the defendant may call any individual referenced in the discovery materials provided by the State of Ohio and/or anyone listed as a witness by the State of Ohio as a witness for the defense in this matter.

10. The Pro se defense states it has only received partial Discovery via an email and it is sorely lacking, and how the State should completely review the previous Discovery and provide all materials of all types requested in this DISCOVERY REQUEST/DEMAND. Specifically requested materials are as follows:

A) the Warrant and or Warrant Affidavit for my, the defendants arrest, but is not just limited to just a Warrant specifically for Arrest but any Warrant of any type what so ever in regards to this case.

B) all Phone Recordings taken by the Ross Sheriffs or any other party the State is injecting into the Case. Please preserve all Phone Calls to the Ross Sheriffs that go back for at least 90 days, and provide all those materials to the Defense.

C) Video and Audio Recordings from the Cameras the Ross Sheriffs (Deputies or any Party) wear on their person from both incidences of when the Ross Sheriffs came by with no Warrant, and when the Ross Sheriffs picked me up with the US Marshalls.

D) Any and all information on the US Marshalls that picked me up on the “alleged warrant” (I haven’t seen it), who called them in (and why?), any documentation the US Marshalls have about this

incident (or anyone else has in regards to them), any recordings, statements, any and all information, records, recordings and anything the US Marshalls have or any Party has about them in regards to this matter (and their involvement in this matter). Also the Contact information to the correct US Marshalls Office, Department or how have you, and any information on that Office or Department or how have you involved in the arrest of me the defendant or this case in anyway.

E) The Badge Number of Ronnie Johnson which is not included (unlike the other Deputy's which is included) in the Partial Discovery that was emailed to me, and any reason why that Officer would not have a Badge number reported, like by not being employed by the Ross Sheriffs anymore, and any disciplinary actions which may have resulted in that or anything at all that would result in Ronnie Johnson not having a Badge Number anymore, and please clarify if it is just a clerical error and update me with the Badge Number.

F) Any Disciplinary Actions taken on the Ross Sheriffs or anyone else in regards to this matter or any matter in concerns to me (Randy Ross) the pro se defense and the State of Ohio (but particularly the Ross Sheriffs), as with any investigations into this matter in any way present, past or future (please immediately inform me of any status changes).

Please mail all documents to me, but I humbly request all Video, Audio and all similar Files be Emailed and Mailed because my newer laptop broke, and my old power house of a Lap Top has Video and Audio Issues, so it would be best to get those specific requested files in both formats because I prefer mail, but may need to listen to Audio Files, and Watch Video Files on my Cellphone. I would prefer all documents be mailed and emailed, but I will only humbly insist on the Audio, Video and other Similar Files be both Mailed and Emailed.

The Foregoing requests are made pursuant to the Sixth and Fourteenth Amendments of the U.S. Constitution (in addition to Ohio Rules of Criminal Procedure: Rule 16; when applicable, but not bound by).

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Rand G Ross of New Haven

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Delivered to the Chillicothe Municipal Court & mailed or delivered to the Prosecution

on 11/21/18_____

~ex factis jus oritur~

Law arises from the facts

Spem Succesuss Alit

Randy G Ross of New Haven & New Hampshire