

STATE OF NORTH CAROLINA
COUNTY OF BUNCOMBE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
15 CRS 434-35

STATE OF NORTH CAROLINA)

v.)

ALLISTER LENNOX.,)
Defendant.)

REQUEST FOR VOLUNTARY
DISCOVERY

NOW COMES defendant ALLISTER LENNOX pursuant to N.C. Gen. Stat. § 15A-902 *et seq.*, and hereby requests that the State voluntarily provide him with the following items and information:

1. Copies of any written or recorded statements by the defendant, any co-defendant, or any alleged co-conspirator whether or not indicted.
2. The substance of any oral statements made by the defendant, any co-defendant, or any alleged co-conspirator whether or not indicted.
3. A copy of the defendant's prior record, if any, as is available to the District Attorney.
4. The opportunity to inspect and copy any photograph books, papers, documents, photographs, motion pictures, mechanical or electronic recordings, or other tangible objects relating to this action, including but not limited to the results and any photographs of any lineups in which the defendant has participated, the results and photographs used in any photo lineups relating to this action, and the results of any other non-testimonial identification procedures relating to this action.
5. Copies of the results or reports of any physical or mental examinations or of any tests,

measurements or experiments made in connection with this action, including all medical records and toxicology reports of the State's witness, all other data, calculations, or writings of any kind including but not limited to, preliminary test or screening results and bench notes.

6. Notice of any expert witnesses that the State reasonably expects to call as a witness at the time of trial, reports of the result of any examinations or tests conducted by the expert, the expert's curriculum vitae, the expert's opinion, and the underlying basis for that opinion, and the report prepared by the expert as required by N.C. Gen. Stat. § 15A-903(a)(2).
7. The opportunity to inspect, examine and test any physical evidence relating to this action.
8. The identity of, the substance of any statements made by, and the opportunity to interview any informants involved in this action, whether or not the State intends to use those informants as witnesses at trial.
9. Any and all exculpatory statements made by any person concerning this action or any other evidence of any sort favorable to the defendant arising out of or relating to this action.
10. For each witness the State intends to offer in this action:
 - (a) The criminal record of that person, including charges, arrests and dispositions.
 - (b) All charges to be brought or threatened to be brought against that person.
 - (c) The substance of any plea bargain agreement, promise, commitment, understanding, or other conversation or communication made by the State with or to any potential witness which relates to any aid or benefit of any sort by the State for or to that potential witness.
11. The complete files of all law enforcement agencies, investigatory agencies, and

prosecutors' offices involved in the investigation of the crimes allegedly committed or the prosecution of the defendant, including but not limited to copies of investigative reports made by any law enforcement officers, including investigating officers' notes.

12. A list of the State's prospective witnesses.

13. Copies of any statements made by any other witnesses or prospective witnesses.

THIS the 1st day of June, 2015.

MORNINGSTAR LAW GROUP

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Request for Voluntary Discovery was served by hand-delivering a copy to the office of the following:

Mr. Alex Bass
Assistant District Attorney
28th Prosecutorial District
P.O. Box 7158
Asheville, NC 28802

This the _____ day of April, 2015.

David W. Venable