

August 3, 2004

Assistant District Attorney E. Vanstrom  
Juvenile Probation  
Erie County Court House  
140 West Sixth Street  
Erie PA 16501

Re: In the Interest of [REDACTED]  
No. 2004-572

Dear Attorney Vanstrom,

I would request the following discovery from you, which of course, is continuous in nature:

- A. Any evidence favorable to the Defendant, which is either material to guilt or to punishment and which is within the possession or control of your office prior to trial.
- B. Any written confession or inculpatory statement made by the Defendant, or the substance of any oral inculpatory statement made by the Defendant; the identity of the person to whom said statement was made; whether or not the Defendant was read Miranda rights prior to the statement; and the length of time between the arrest and said statement being given.
- C. The Defendant's prior juvenile criminal records to include traffic violations and summary offenses, if any.
- D. The circumstances and results of any identification of the Defendant, either by voice, photograph or in person identification and the circumstances and results of any failure of the alleged victim to identify the Defendant. If the identification was by photograph, then please provide a copy of the photographs used in the process.
- E. All written or recorded statements and/or substantially verbatim oral statements of the alleged victim(s).

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F. The results of and/or reports of scientific tests or expert opinions to include but not limited to, medical records and reports and/or accident reports of either the victim(s) or the Defendant.

G. A copy of any video tape that may have been taken of the Defendant, victim, or eye witness, to include any footage from security cameras or similar devices.

H. Any tangible objects, including documents, cancelled checks, contracts, photographs, fingerprints, weapons, medical or other reports or other tangible evidence which is now in or becomes in the possession or control of your office prior to trial, to include any which may have been subpoenaed by your office or obtained during the investigation.

I. The names and addresses of any eyewitnesses.

J. All written or recorded statements and/or substantially verbatim oral statements of any eyewitnesses whether or not the commonwealth intends to call said witnesses to trial.

K. The alleged victim's and witnesses' prior criminal records, if any.

L. A summary and/or copy of any pending criminal charges against the alleged victim, if any.

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- M. A copy of the police report regarding the alleged incident(s), including but not limited to any investigator notes, and including the names of any witnesses.
- N. A copy of any investigator notes, whether or not they are part of the police report.
- O. A copy of any and all records, notes, and reports relating to the psychological and/or psychiatric treatment, counseling, and/or evaluation of the alleged victim.

Thank you.

Yours truly,

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Alison M. Scarpitti, Esquire

AMS/