

FILED DISTRICT COURT  
Stephens County, Okla.

MAY 30 2025

MELODY HARPER  
Court Clerk

IN THE DISTRICT COURT OF STEPHENS COUNTY

STATE OF OKLAHOMA

STATE OF OKLAHOMA,

Plaintiff,

vs.

Heather Chandler

Defendant.

Case No.

CF-2025-109

DEFENDANT'S FORMAL REQUEST FOR DISCOVERY

In addition, counsel for the Defendant requests from, demands of and advises the Plaintiff as follows.

1. The Defense demands:
  - a. the names and addresses of witnesses which the state intends to call at trial, together with their relevant, written or recorded statement, if any, or if none, significant summaries of any oral statement,
  - b. law enforcement reports made in connection with the particular case,
  - c. any written or recorded statements and the substance of any oral statements made by the accused or made by a codefendant,
  - d. any reports or statements made by experts in connection with the particular case, including results of physical or mental examinations and of scientific tests, experiments, or comparisons,
  - e. any books, papers, documents, photographs, tangible objects, buildings or places which the prosecuting attorney intends to use in the hearing or trial or which were obtained from or belong to the accused,
  - f. any record of prior criminal convictions of the defendant, or of any codefendant, and
  - g. Oklahoma State Bureau of Investigation (OSBI) rap sheet/records check on any witness (including law enforcement) listed by the state as a witness who will testify at trial.

See Okla. Stat. title 22 §2002(A)(1).

2. The Defendant demands that the State disclose any evidence favorable to the Defendant if such evidence is material to either guilt or punishment. See Okla. Stat. title 22 §2002(A)(2).

3. The Defendant advises the State that the prosecuting attorney's obligations to disclose the requested information extends to:

- a. material and information in the possession or control of members of the prosecutor's staff,
- b. any information in the possession of law enforcement agencies that regularly report to the prosecutor of which the prosecutor should reasonably know, and
- c. any information in the possession of law enforcement agencies who have reported to the prosecutor with reference to the particular case of which the prosecutor should reasonably know.

See Okla. Stat. title 22 §2002(A)(3).

4. The Defendant demands that, if, prior to or during trial, the prosecutor discovers additional evidence or material previously requested or ordered, which is subject to discovery or inspection under the Oklahoma Criminal Discovery Code, the prosecutor promptly notify counsel for the Defendant or the court of the existence of the additional evidence or material. See Okla. Stat. title 22 §2002(C).

5. The Defendant requests that the State take all reasonable, necessary measures to preserve any evidence pertaining to this matter.

6. The Defendant requests full and complete copies of the following public records that pertain to this matter:

- a. Any record documenting the facts of any arrest in this matter, including the cause of arrest and the name of the arresting officer;
- b. A chronological list of all incidents, including initial offense report information showing the offense, date, time, general location, officer, and a brief summary of what occurred;
- c. Radio logs, including a chronological listing of the calls dispatched;
- d. Conviction information, including the name of any person convicted of a criminal offense;
- e. Disposition of all warrants, including orders signed by a judge of any court commanding a law enforcement officer to arrest a particular person;

- f. A crime summary, including an agency summary of crimes reported and public calls for service by classification or nature and number;
- g. Jail registers, including jail blotter data or jail booking information recorded on persons at the time of incarceration showing the name of each prisoner with the date and cause of commitment, the authority committing the prisoner, whether committed for a criminal offense, a description of the prisoner, and the date or manner of discharge or escape of the prisoner;
- h. Audio and video recordings from recording equipment attached to law enforcement vehicles or associated audio recordings from recording equipment on the person of a law enforcement officer; and
- i. Audio and video recordings from recording equipment attached to the person of a law enforcement officer that depict:
  - (1) the use of any physical force or violence by a law enforcement officer,
  - (2) pursuits of any kind,
  - (3) traffic stops,
  - (4) any person being arrested, cited, charged or issued a written warning,
  - (5) events that directly led to any person being arrested, cited, charged or receiving a written warning,
  - (6) detentions of any length for the purpose of investigation,
  - (7) any exercise of authority by a law enforcement officer that deprives a citizen of his or her liberty,
  - (8) actions by a law enforcement officer that have become the cause of an investigation or charges being filed,
  - (9) recordings in the public interest that may materially aid a determination of whether law enforcement officers are appropriately performing their duties as public servants, or
  - (10) any contextual events occurring before or after the events depicted in divisions (1) through (9) above.

See Okla. Stat. title 51, §24.a.1, et seq.

7. The Defendant demands that the State provide copies of any sworn statement taken of any person having knowledge of this matter. See Okla. Stat. title 22 §749.
8. The Defendant requests an opportunity to inspect and to obtain copies of any and all photographic evidence in possession of the State or any law enforcement agency involved in investigating this matter.
9. The Defendant requests that the State provide copies of all training material or documents that the involved and arresting officers or probationary officers utilized in their "training and experience" with this matter and all documents and logs concerning any testing machinery used on the Defendant in the officers' investigation of this matter, including but not limited to all service and warranty records of any machinery, testing or monitoring device or methods used on the Defendant.
10. The Defendant requests that the State provide copies of any documents or records pertaining to any final disciplinary action resulting in loss of pay, suspension, demotion of position, or termination of any officer, trooper, deputy, detective or agent involved in the investigation of this matter. See Okla. Stat. title 51 §24A.7(B)(4).
11. The Defendant requests that the State provide copies of any deferred prosecution agreement between the State and any of the State's witnesses (including law enforcement). See Okla. Stat. title 22 §305.2(H).
12. The Defendant requests the Curriculum Vitae for each and every person that the State intends to call as an expert in this case.
13. The Defendant requests an opportunity to inspect, review and obtain samples and copies of reports, records, and/or other evidentiary material which is the basis for an opinion of a state's expert witness. Stafford v. District Court of Oklahoma Co., 595 P.2d 797 (Okla. Cr. 1979).
14. The Defendant asserts her constitutional right to discovery of any and all exculpatory, material evidence, and hereby requests that any and all exculpatory, material evidence be provided to Defendant in a timely manner as prescribed by law. U.S. Const. Amendments 5 and 14; see also Frederick v. State, 2001 OK CR 34, ¶ 206, 37 P.3d 908, 958; Brady v. Maryland, 373 U.S. 83, 83 (1963); United States v. Agurs, 427 U.S. 97, 96 (1976).
15. The Defendant requests reports of all exculpatory evidence in the form of inconsistent statements made by the State's witnesses, including, but not limited to, contradictory or inconsistent statements made by the witnesses, law enforcement, and the Defendant. United States v. Bagley, 473 U.S. 667, 105 S.Ct. 3375 (1985).
16. The Defendant requests a notice of other crimes, testifying witnesses, and evidence admissible against this Defendant. Burks v. State, 594 P.2d 771 (Okla. Cr. 1979).

17. The Defendant requests an opportunity to inspect and obtain copies of all records, reports, and photographs reflecting the manner and the mode in which the State conducted any and all pre-trial identification proceedings. This request includes, but is not limited to, any "live" line-ups, any photographic line-ups, and any other proceeding or investigation during which a State's witness was given the opportunity to view the accused or a photograph of the accused or the purpose or with the result of making an identification of a suspect. United States v. Wade, 388 U.S. 218, 87 S.Ct. 1926 (1967); Thompson v. State, 438 P.2d 287 (Okl.Cr. 1968).

18. The Defendant requests, in writing, a detailed description of any and all agreements between the State and any of its witnesses reflecting said witnesses obtaining special or lenient treatment in pending or potential criminal cases in exchange for their testimony in this case. Napue v. Illinois, 360 U.S. 264, 79 S.Ct. 1173 (1959); Binsz v. State, 675 P.2d 448 (Okl.Cr. 1984).

19. The Defendant requests, in writing, a detailed description of any and all agreements between the State and any confidential informant(s) reflecting said confidential informant(s) obtaining special or lenient treatment in pending or potential criminal cases in exchange for their assistance or testimony. California v. Trombetta, 467 U.S. 479, 104 S.Ct. 2528 (1984); Giglio v. United States, 405 U.S. 150, 92 S.Ct. 763 (1972).

20. The Defendant requests the names, addresses, and telephone numbers of all persons interviewed by the District Attorney, Assistant District Attorney, Investigator, or any other law enforcement officer acting under the supervision and control of the Plaintiff or for its benefit, in connection with this case or this Defendant. Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194 (1963); Burks v. State, 594 P.2d 771 (Okl.Cr. 1979).

21. The Defendant requests a list of names and addresses of anyone who might have favorable testimony on behalf of the Defendant. Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194 (1963); Levin v. Katzenbach, 373 F.2d 287 (D.C. Cir. 1986).

Heather Chandler  
May 30, 2005