TONY RACKAUCKAS, DISTRICT ATTORNEY
COUNTY OF ORANGE, STATE OF CALIFORNIA
BY: KEITH BOGARDUS
Senior Deputy District Attorney
State Bar Number 202810
700 Civic Center Drive West
Santa Ana, California 92701
Telephone: (714) 834-3952

Attorneys for Plaintiff

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER
AUG 07 2013
ALAN CARLSON, Clerk of the Court
BY L. HOYLE, DEPUTY

SUPERIOR COURT OF CALIFORNIA

COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

THE PEOPLE OF THE STATE OF CALIFORNIA Plaintiff, Vs. MANUEL ANTHONY RAMOS, JAY PATRICK CICINELLI, JOSEPH ANDREW WOLFE Defendants	Case Nos.: 11CF2575 12ZF0148 **INFORMAL REQUEST FOR DISCOVERY PURSUANT TO PENAL CODE SECTION 1054.3**

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

Notice is hereby given, pursuant to Penal Code section 1054.3, that the People of the State of California require disclosure and production of the following materials and information prior to trial:

1. Names, dates of birth, and addresses of all persons the defendant intends to call as witnesses at trial.[1]

1. Persons whom the defense intends to call as witnesses at trial, in the context of Penal Code section 1054.3, includes all witnesses the defense reasonably anticipates it is likely to call. *In re Littlefield* (1993) 5 Cal.4th 122.

2. Any written or recorded statements of those persons, or reports or statements of those persons, including any reports or statements of experts made in connection with the case, including the results of any physical or mental examinations, scientific tests, experiments, or comparisons, and computer or data analyses which the defendant intends to offer in evidence at trial.[2]

3. Any unrecorded oral statements of all persons, including experts, the defendant intends to call as witnesses at trial.[2]

4. Any original documentation, including handwritten notes and raw test data, of any examinations, tests, experiments, or comparisons performed by an expert witness the defendant intends to call as witnesses at trial.

5. Any and all information regarding the credentials, degrees, training, education, and experience, including but not limited to the resume or curriculum vitae of any expert witness the defendant intends to call as a witness at trial.

6. Any real evidence which the defendant intends to offer in evidence at trial including, but not limited to, records, photographs, audio recordings, or video recordings as well as modifications, enhancements or other alterations to any audio or video recordings already part of the discovery.

This request for discovery should be deemed a continuing request and any information or materials responsive to this request and/or required to be provided to the People under the criminal discovery statute should continue to be timely provided.

Dated this August 5, 2013.

Respectfully submitted,

TONY RACKAUCKAS, DISTRICT ATTORNEY
COUNTY OF ORANGE, STATE OF CALIFORNIA

By: _____

KEITH BOGARDUS

Senior Deputy District Attorney

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2. *Roland v. Superior Court* (2004) 124 Cal. App. 4th 154

FAX TRANSMISSION

OFFICE OF THE DISTRICT ATTORNEY
Homicide Unit
401 Civic Center Dr. West
Santa Ana, CA 92701
(714) 347-8482
Fax: (714) 834-3668

TONY RACKAUCKAS
DISTRICT ATTORNEY

FROM: VanTuyen Tran

Phone No.: 714-347-8464 Fax No.: 714-834-3668

TO: Law Office of Barnett & Barnett
Attn: John Drummond Barnett
1 City Blvd W., Ste. 500, Orange, Ca 92868

Phone No.: (714) 634-3397 Fax No.: (714) 634-1769

Date: August 5, 2013 Number of pages: 3 Including the cover

Subject: Re: MANUEL ANTHONY RAMOS (Case Numbers 11CF2575, 12ZF0148)
JAY PATRICK CICINELLI
JOSEPH ANDREW WOLFE

PROOF OF SERVICE BY FASCIMILE MACHINE

STATE OF CALIFORNIA)
) ss
COUNTY OF ORANGE)

I am employed within the County of Orange, State of California. I am over the age of eighteen years and not a party to the within entitled action; my business address is:
401 Civic Center Drive West, Santa Ana, CA 92701.

On 8-5-13, I faxed the **INFORMAL REQUEST FOR DISCOVERY PURSUANT TO PENAL CODE SECTION 1054.3** in the following in said action by facsimile machine. The fax number used was (714) 834-3668. The facsimile machine I used complied with rule 2003(3) and the machine reported no error. I caused the machine to print a transmission record, a copy of which is attached to this declaration.

I certify (or declare) under penalty of perjury that the foregoing is true and correct. Executed 8-5-13, at Santa Ana, California.

VanTuyen Tran – Information Processing Specialist

IF THERE ARE ANY QUESTIONS OR PROBLEMS, AND YOU DO NOT RECEIVE ALL OF THE PAGES, PLEASE CALL, VanTuyen Tran @ 714-347-8464.

TRANSMISSION VERIFICATION REPORT

TIME : 08/05/2013 17:25
NAME : OCDA HOMICIDE
FAX : 714-834-3668
TEL : 714-834-3600
SER.# : BROD5J264885

DATE,TIME	08/05 17:24
FAX NO./NAME	917146341769
DURATION	00:00:55
PAGE(S)	03
RESULT	OK
MODE	STANDARD ECM

FAX TRANSMISSION

OFFICE OF THE DISTRICT ATTORNEY
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Subject: JOSEPH ANDREW WOLFE

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FROM: VanTuyen Tran

Phone No.: 714-347-8464 Fax No.: 714-834-3668

TO: Lackie, Dammeier & McGill, APC
Attn: Michael David Schwartz
367 N 2nd Ave, Upland, CA 91786

Phone No.: (909) 985-4003 Fax No.: (909) 985-3299

Date: August 5, 2013 Number of pages: 3 Including the cover

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TIME : 08/05/2013 17:30
NAME : OCDA HOMICIDE
FAX : 714-834-3668
TEL : 714-834-3600
SER.# : BROD5J264885

DATE,TIME	08/05 17:29
FAX NO./NAME	919099853299
DURATION	00:00:56
PAGE(S)	03
RESULT	OK
MODE	STANDARD ECM

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TONY RACKAUCKAS
DISTRICT ATTORNEY

FROM: VanTuyen Tran

Phone No.: 714-347-8464 Fax No.: 714-834-3668

TO: Nasatir Hirsch et. al.
Attn: Vicki Podberesky
2115 Main St., Santa Monica, CA 90405

Phone No.: (310) 399-3259 Fax No.: (310) 392-9029

Date: August 5, 2013 Number of pages: 3 Including the cover

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NAME : OCDA HOMICIDE
FAX : 714-834-3668
TEL : 714-834-3600
SER.# : BROD5J264885

DATE,TIME	08/05 17:32
FAX NO./NAME	913103929029
DURATION	00:00:28
PAGE(S)	03
RESULT	OK
MODE	STANDARD ECM

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