

STATE OF WISCONSIN,

Plaintiff,

Case No.

v.

JOHN DOE,

Defendant.

Defendant's Discovery Demand

NOW COMES the above-named defendant, by his attorney, Jeffrey W. Jensen, and pursuant to Sec. 971.23, STATS hereby demands that the State serve upon the defendant a reasonable time before trial the following:

1. Any written or recorded statement concerning the alleged crime made by the defendant, including the testimony of the defendant in a secret proceeding under s. 968.26 or before a grand jury, and the names of witnesses to the defendant's written statements.
2. A written summary of all oral statements of the defendant which the district attorney plans to use in the course of the trial and the names of witnesses to the defendant's oral statements.
3. Evidence obtained in the manner described under s. 968.31 (2) (b), if the district attorney intends to use the evidence at trial.
4. A copy of the defendant's criminal record.
5. A list of all witnesses and their addresses whom the district attorney intends to call at the trial. This paragraph does not apply to rebuttal witnesses or those called for impeachment only.
6. Any relevant written or recorded statements of a witness named the State's witness list, including any videotaped oral statement of a child under s. 908.08, any reports or statements of experts made in connection with the case or, if an expert does not prepare a report or statement, a written summary of the expert's findings or the

subject matter of his or her testimony, and the results of any physical or mental examination, scientific test, experiment or comparison that the district attorney intends to offer in evidence at trial.

7. The criminal record of a prosecution witness which is known to the district attorney.

8. Any physical evidence that the district attorney intends to offer in evidence at the trial.

9. Any exculpatory evidence.

Dated at Milwaukee, Wisconsin, this _____ day of _____, 2007.

LAW OFFICES OF JEFFREY W. JENSEN
Attorneys for the Defendant

By: _____
Jeffrey W. Jensen
State Bar No. 01012529

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