

Name: Richard Quigley
Address: 2860 Porter Street, Soquel, CA 95073

Defendant in Pro Per

SUPERIOR COURT OF CALIFORNIA, IN AND FOR SANTA CRUZ COUNTY
701 Ocean Street
Santa Cruz, CA 95062

PEOPLE OF THE STATE OF CALIFORNIA by
CHP Officer Robert K. Messing, Plaintiff(s)

vs.

Richard Quigley, Defendant

CASE #: 90260235

Citing Agency: California Highway Patrol Officer: Robert K. Messing Badge #: 10914

INFORMAL DISCOVERY REQUEST

TO THE SANTA CRUZ COUNTY DISTRICT ATTORNEY, AND TO THE ABOVE-REFERENCED POLICE AGENCY

1. Pursuant to California Penal Code §§ 1054 and 1054.5(b), the above-named defendant hereby requests that you provide disclosure of the following:
 - a. Defendant's statement and any and all relevant written or recorded statements of witnesses, including any statements, diagrams, or drawings, made by the citing police officer on the reverse of the above-referenced Notice to Appear or on any piece of paper or other medium of information storage. YOU ARE SPECIFICALLY REQUESTED TO PROVIDE THE ABOVE-REFERENCED DEFENDANT OR ATTORNEY OF RECORD WITH A PHOTOSTATIC COPY OF THE REVERSE SIDE OF THE CITING OFFICER'S COPY OF THE ABOVE-REFERENCED NOTICE TO APPEAR, IF THE CITING OFFICER HAS MADE ANY NOTATIONS ON IT.
 - b. The names and addresses of all prosecution witnesses who will testify at trial.
 - c. A copy of any and all documents, or other evidence, that shows that the defendant had actual knowledge that there had been a determination of noncompliance, by an independent testing laboratory, with Federal Motor Vehicle Safety Standard 218 on the item the defendant had on his head at the time you issued citation #KV50993 .
 - d. A copy of all training materials, directives, statutes, memos, bulletins, or any other publication which serve as the standard by which you determine what constitutes a helmet.
 - e. A copy of California Highway Patrol Policy relating to enforcement of Vehicle Code §27803.
2. The following is disclosed to you pursuant to Penal Code § 1054.3:
 - a. NAMES AND ADDRESSES OF WITNESSES (OTHER THAN DEFENDANT) WHO WILL TESTIFY AT TRIAL:
() None.
(X) The Following: Steve Bianco, PO Box 1422, San Marcos, CA 92079 (helmet and helmet law expert)
 - b. RELEVANT UNPRIVILEGED WRITTEN OR RECORDED STATEMENTS OF WITNESSES:
() None.
(X) A CD copy of the audio tape of the traffic stop will be made available by January 31, 2000.

DATED: _____

Defendant, pro se