

406 Fifth Street NW, Lower Level Suite  
Washington, DC 20001

William G. Dansie (DC)  
Lucas I. Dansie (DC, MD)

**INITIAL DISCOVERY REQUEST AND REQUEST FOR PRESERVATION OF EVIDENCE**

2021 CMD 000164

**United States v. Anthony Tamarro**

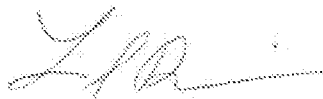
January 7, 2021

- 1. Statements:** I request (a) that you disclose to me and make available for inspection, copying, or photographing, any relevant written or recorded statements made by the defendant, or copies thereof, within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the government; (b) that portion of any written record containing the substance of any relevant oral statement made by the defendant whether before or after arrest in response to interrogation by any person then known to the defendant to be a government agent, and any recorded testimony of the defendant before a grand jury which relates to the charged offense; and (c) that you disclose the substance of any other oral statement made by the defendant whether before or after arrest in response to interrogation by any person then known to the defendant to be a government agent if the government intends to use that statement at trial.
- 2. Prior Record:** I request that you furnish me with a copy of the defendant's prior criminal record, if any, as is within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known, to the prosecutor.
- 3. ID Procedures:** I request information of any identification procedure followed relating to this offense.
- 5. Evidence of Uncharged Misconduct:** I request notice in advance of trial concerning uncharged misconduct that the government will seek to introduce against my client. Please provide specifics regarding the alleged prior bad act or inextricably linked activity, including exact time and place of occurrence.
- 6. Brady:** Under Brady v. Maryland, 373 U.S. 83 (1963), I request any and all information likely to exculpate the defendant. Rule 16 explicitly provides that upon request, "the government must disclose" and "shall permit" inspection and copying of all material covered by the Rule. As such, I request that all discoverable material be disclosed immediately, but in no event later than the preliminary hearing or status hearing in this case.
- 7. Super. Ct. Crim. R. 26.2:** I request early disclosure of all Jencks material, so that any issues concerning disclosure may be resolved in advance and proceedings will not be delayed while I review the material and prepare to use it in cross-examination, or consider any discovery or Brady ramifications. I also request that you diligently preserve all Jencks material.
- 8. Physical Evidence:** I request that you preserve all physical evidence material to the preparation of my client's defense, including but not limited to all property allegedly belonging to all complaining witnesses and my client, unless such property is released directly to my client or his/her authorized designee. This preservation request is served in part to ensure that counsel has an opportunity to conduct tests and examinations on any physical property that counsel deems appropriate and necessary.
- 9. Body Camera/Other Video Footage & Data:** I request that you preserve and produce as soon as possible all body camera footage and data, **and all other video footage** and data (e.g., station house video footage and data, MPS street camera footage and data), material to this case, including but not limited to body camera footage and data (or other video footage and data) relating to the defendant, any alleged victim, and/or any potential witness.

**Additionally**, it is my understanding that police documentation and reports provided by MPD do not capture all of the information input into MPD's data management system, I/Leads. I further understand that some MPD forms simply fail to print the full information input by law enforcement and that some of the data input into I/Leads is not captured in any printed police documentation whatsoever. Obviously, this raises a number of Rule 16, *Brady*, and *Jencks* issues in connection with this case. As a result, I request that you immediately print out and provide to the defense **all raw data** from the I/Leads system related to this case.

Thank you in advance for your prompt attention to this matter.

Sincerely,



Lucas I. Dansie, D.C. Bar # 998973  
Counsel for Defendant  
Dansie & Dansie, LLP  
406 5<sup>th</sup> St. NW  
Washington, DC 20001  
Phone: 202.783.1597  
Fax: 202.315.2513  
Email: [Lucas@Dansielaw.com](mailto:Lucas@Dansielaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Request for Discovery and Preservation of Evidence was served via CaseFile Xpress on Government Counsel on the above listed date.

/s/ Lucas I. Dansie