County of Santa Clara
Office of the District Attorney

270 Grant Ave. 4th Floor
Palo Alto, CA 94306
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Dolores A. Carr
District Attorney

June 25, 2008

David Beauvais
Attorney at Law
1904 Fraklin Street, Suite 800
Oakland, CA 94612

Re: JOSEPH ANTHONY CIAMPI
Docket No. BB833050

Dear Mr. Beauvais:

Enclosed is discovery for the above-entitled case, namely:

- (One) CD labeled: B20080601824, People v. Ciampi, Def. Voicemail to Peter Waite.

With regards to your letter requesting informal discovery dated April 23, 2008, I have discussed your various requests with DDA Medved and have prepared the following responses:

**Regarding your Line-item number 1**: Names and addresses of witnesses the People intend to call at preliminary hearing and or trial:

- Ofc. Temores, Badge # T7313
- Ofc. Wagner, Badge # W107
- Ofc. Burger, Badge #B9603

**All officers are from the Palo Alto Police Department, which is located at 275 Forest Ave., Palo Alto Ca, 94301, (650) 329-2413.**

**Regarding your Line-item number 4**: Prior felony convictions of any witness:

- **There are none.**

Defendant: Joseph Anthony Ciampi
Docket Number: BB833050

6/25/2008

**Regarding your line-item number 5**: Exculpatory evidence:

- You have been provided a letter we received from the Attorney Generals office dated May 16, 2008 regarding an anonymous letter sent to their office concerning Officer Burger's Taser video. At this time this is all exculpatory evidence we have in our possession, however should anything further be discovered it will be provided.

**Regarding your line-item number 7**: Dispatch communications and related computer printouts:

- A copy of all radio / dispatch communication with accompanying CAD was requested and had been available for pickup since May 2nd. I informed you of this via a facsimile, regrettably you may not have received my correspondence.

**Regarding your line-item number 11:** Request for booking photo.

- I have requested a copy of the Defendant's booking photo and booking sheet from the Santa Clara Sheriff's Office and will provide you with a copy once it is made available to me.

**Regarding your line-items numbers 9, 13, 14 and 15:**

- These items must be requested via subpoena upon the Agency directly.

Sincerely,

Philip Charlebois
Paralegal

DA Case #: 080308287

City of Palo Alto
*Office of the City Attorney*

July 23, 2008

David J. Beauvais
1904 Franklin Street, Suite 800
Oakland, CA 94612

RE: People. V. Joseph Anthony Ciampi

Dear Mr. Beauvais:

This is in response to the subpoena issued to the Custodian of Records, Palo Alto Police Department in the above referenced matter. As you should be aware, Pursuant to Penal Code section 1054.5(a), the informal discovery procedures outlined in Penal Code Chapter 10 of Title 5 are "the only means by which the defendant may compel the disclosure or production of information from . . . law enforcement agencies which investigated or prepared the case against the defendant . . ." These procedures provide you with the means for obtaining discoverable information. We will not be responding to the unauthorized subpoena.

Sincerely,

DONALD A. LARKIN
Assistant City Attorney

DAL:sn

cc: Javier Alcala, Supervising Deputy District Attorney
Lisa Scheff, Coordinator, Police Technical Services

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