

**FILED**

JUL 17 1981

NO. 81  
MORGAN M. FINLEY  
CLERK OF THE CIRCUIT COURT

PEOPLE OF THE STATE OF ILLINOIS )  
 )  
Plaintiff )  
 )  
v. )  
 )  
RICHARD WOLDOW, )  
 )  
Defendant )

MOTION FOR DISCOVERY

The defendant in the above entitled cause, Richard Woldow, by his attorney, Paul Bradley, moves this Honorable Court for an order to be entered upon the State's Attorney to disclose and produce certain evidence which is essential and material to the preparation of the defense. The defense requests that such disclosures and production include, but not be limited to, the following:

1. The names and address of persons the prosecution may or may not call as witnesses, including production of the following:
  - a. Any written or recorded statements by these witnesses, including those written or recorded statements made by police officers; and
  - b. Any memoranda reporting or summarizing oral statements by such witnesses.
  
2. The names and addresses of persons who were occurrence witnesses of the alleged offense, or who were present at the time of the arrest of the defendant, whom the State may or may not call as witnesses, including production of the following:
  - a. Any written or recorded statements by these witnesses, including those written or recorded statements made by police officers; and
  - b. Any memoranda reporting or summarizing oral statements by such witnesses.
  
3. Any written or recorded statements and the substance of any oral statements made by the accused, including the following:
  - a. A list of witnesses to the making and acknow-

- (b) The following witnesses made written statements:

none known

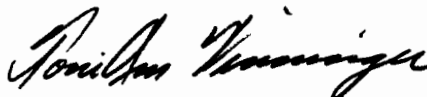
Written statements of witnesses, if any, have been tendered to the defense in open court.

- (c) All memoranda reporting or summarizing oral statements made by witnesses are contained in the police reports tendered to the defense in open court.
3. The People may or may not call any or all persons listed in 2(a) as occurrence witnesses at the scene of the offense or at the time of arrest.
4. (a) Written or recorded statements of the defendant or co-defendant(s), if any, have been tendered to the defense in open court. The date, time, and place of such statement(s), the circumstances under which it was made and the witnesses to the making or acknowledgment of the statement(s), are contained in the police reports tendered to the defense in open court.
- (b) Summaries of oral statement(s) of the defendant or co-defendant(s), if any, the date, time and place of such statement(s), the circumstances under which the statement(s) were made, and the witnesses present are contained in the police reports tendered to the defense in open court.
5. The transcript of the Grand Jury minutes, if any, will be made available to the defense for inspection and copying upon being received by the People.
6. (a) The following articles, if any, may or may not be offered into evidence by the People at the time of the trial of this cause:  
PHOTOS
- Any and all other property mentioned in the police reports.
- (b) The date, time, and place of acquisition, the persons involved in the acquisition and the circumstances of the acquisition of the articles are contained in the police reports tendered to the defense in open court.
- (c) The People will comply with all reasonable requests for inspection by the defense.
7. Reports of experts, if any, made in connection with this particular case, including the results of physical or mental examinations, scientific tests, examinations and comparisons, will be tendered to the defense upon being received by the People.

8. Please see 6(a) for any books, documents, photographs and tangible objects obtained from or which belonged to the defendant which the People may or may not use at the trial of this cause.
9. The People have no knowledge at this time that any of its potential witnesses have any criminal convictions.
10. The People intend to use certified copies of all convictions of the defendant, if any exist, for purposes of impeachment during the trial of this cause. The record of these convictions is available for inspection.
11. The People may or may not rely on the following prior acts or convictions of the defendant of a similar nature for proof of knowledge, intent, motive, scheme, or design.  
Series of peeping Tom incidents  
see attached police reports
12. The dates, times, places, circumstances, results and persons present at any identification confrontations involved in this cause are contained in the police reports tendered to the defense in open court.  
  
Any photographs available to the People which were used in connection with any photographic identification will be made available for inspection.  
  
Any lineup photographs available to the People will be made available for inspection.
13. No electronic surveillance was employed in connection with this cause.
14. Any evidence which was acquired by the execution of any legal process, whether a search warrant, arrest warrant or other process or court order, is listed in 6(a) and in the police reports and other documents tendered to the defense in open court, if such process was used.  
  
A copy of any legal process executed in connection with this cause will be available for inspection and copying if a copy is not in the court file.
15. No informant that the People intend to call as a witness in the trial of this cause exists.
16. The People are unaware of any evidence or witnesses which may be favorable to the defense in this cause.
17. The People will comply with lawful orders of Court in this cause.

RICHARD M. DALEY  
State's Attorney of Cook County

By:



Toni Ann Winninger  
Assistant State's Attorney

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - CRIMINAL DIVISION

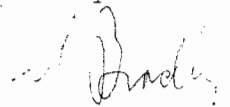
PEOPLE OF THE STATE OF ILLINOIS, )  
 )  
 ) Plaintiff, )  
 )  
 ) v. ) Information No. 81 I 20026801  
 )  
 ) RICHARD WOLDOW, )  
 )  
 ) Defendant. )

DEFENDANT'S ANSWER TO MOTION FOR DISCOVERY

Defendant Richard Woldow by his attorney, Paul  
Bradley, answers the State's Motion for Discovery as follows:

1. The defense will be the failure of the evidence to prove Defendant guilty beyond a reasonable doubt of the offense charged.
2. No witnesses that are not contained in Police report tendered by State. No written statements of witnesses.
3. No reports of tests at this time.
4. No physical evidence.
5. Defendant acknowledges his responsibility under Illinois Supreme Court Rules 413(c) and 413(d).

Respectfully submitted,

  
Paul Bradley, Attorney for  
Defendant, Richard Woldow  
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Suite 1220  
Chicago, Illinois 60604  
(312) 427-6050

**FILED**

MARILYN M. FINLEY  
CLERK OF THE CIRCUIT COURT