

INF-1

STATE OF ILLINOIS )  
 ) SS.  
COUNTY OF COOK )

THE CIRCUIT COURT  
OF  
COOK COUNTY

PEOPLE OF THE STATE OF ILLINOIS )

v. )

Richard Woldow )

INFO. NO. 81T20026801

INFORMATION

THE PEOPLE OF THE STATE OF ILLINOIS represented by the State's Attorney of Cook County, do hereby inform and charge that against the peace and dignity of the People of the State of Illinois and in violation of the laws of the State of Illinois the herein named defendant(s) contrary to the 1979 Illinois Revised Statutes<sup>as amended</sup> did violate said laws of Illinois as described herein.

MORGAN M. FINLEY, CLERK OF THE CIRCUIT COURT OF COOK COUNTY

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The State's Attorney of Cook County now appears before the Circuit Court of Cook County and in the name and by the authority of the People of the State of Illinois

states that on 19th May 2nd, 1981 in Cook County, Illinois

Richard Woldow a ~~male~~ person of the age of ~~seventeen~~ fourteen years and upwards

committed the offense of Contributing to the sexual delinquency of a child indecent liberties with a child F.A.C. 11-11-1

in that he, with the intent to arouse and satisfy his sexual desires, lewdly fondled and touched Nancy Arndt, a child under the age of eighteen ~~sixteen~~ years,

In violation of Chapter 38 Section 11-5(a-3) Illinois Revised Statutes and against the peace and dignity of the People of the State of Illinois.

(Count No. 1)

MORGAN M. FINLEY, CLERK OF THE CIRCUIT COURT OF COOK COUNTY

STATE OF ILLINOIS )  
 ) ss.  
COUNTY OF COOK )

THE PEOPLE OF THE STATE OF ILLINOIS by the State's Attorney of Cook County, through his Assistant State's Attorney, after first being duly sworn on his oath, deposes and swears that the foregoing 1 count(s) in this information has have been read and subscribed by him as evidenced by his signature below and that the same in each count hereby incorporated is true.

James M. Carr.  
Assistant State's Attorney

Subscribed and sworn to before me June 5th, 1981.

Carol Zuele  
Judge, Clerk, or Notary

The bail is fixed at 10.000 Bond to stand

JUDGE: Nicholas Pomar  
Enter pres.

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

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

Information No. 81 I 20026801

**FILED**

AUG 21

MOTION IN LIMINE

MARGARET M. STANLEY  
CLERK OF THE CIRCUIT COURT

Defendant, Richard Woldow, by his attorney, Paul

Bradley, moves this Honorable Court to enter an order prohibiting the State from introducing evidence of his prior arrest and conviction record.

In support thereof, it is stated that:

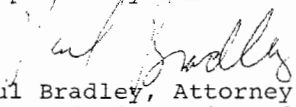
1. It is Defendant's belief that at the trial of the above captioned case, the State will attempt to introduce evidence of a prior conviction for disorderly conduct entered January 9, 1981, and his arrest for the offense of Trespass to Land on September 1, 1978.

2. Neither the conviction or arrest are relevant to the issues involved in the instant case or have any bearing on the credibility of Defendant.

3. Introduction of evidence of Defendant's conviction or arrest would adversely affect Defendant in the eyes of the trier of fact at a trial of this case.

WHEREFORE, Defendant requests this Honorable Court to enter an order prohibiting the State from attempting to introduce evidence of his prior conviction and arrest at the trial of this case.

Respectfully submitted,

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

ledgment of such statements;

b. The time, place and date of the making of such statements;

c. Any written or recorded memoranda containing the substance of any oral statements.

4. A list of all physical property related to this case that the State has in its possession or that is in the possession of law enforcement officials, including;

a. The date and time the property was acquired;

b. Location from which the property was acquired;

c. The name and address of the person or persons who first took the property into their possession;

d. Reports made by law enforcement authorities pertaining to this property, including, but not limited to scientific reports, and the results of scientific tests, experiments or comparisons,

and that such property be made available to the defendant for inspection before trial.

5. Any books, papers, documents, photographs or tangible objects which the prosecution intends to use in any hearing or trial or which were obtained from or belong to the accused.

6. Any reports or statements of experts made in connection with the case, including the results of physical or mental examinations and of scientific tests, experiments or comparisons.

7. Any record of prior criminal convictions, which may be used for impeachment, of persons whom the State intends to call as witnesses at any hearing or trial.

8. It is requested that the prosecution disclose its intention to use certified copies of any conviction of the accused for purposes of impeachment during trial, together with the time of any such conviction and the convicting jurisdiction.

9. It is requested that the prosecution disclose any evidence in its possession concerning prior acts or convictions of crimes of a similar nature on which it intends to rely at trial for proof of knowledge, intent or motive.

10. It is requested that the prosecution disclose the names and addresses of witnesses the State intends to call at trial for identification of the defendant as the perpetrator of the alleged crime, including the following information;

a. Time, date and place of identification confrontations;

b. If photographic identification procedures were used, production of any photograph used, whether of the defendant or of other persons;

c. Names and addresses of all persons present at such viewing;

d. Any pictures taken of the line-up or show-up;

e. Names and addresses of any individuals who confronted the accused and made no identification of him as the perpetrator of the alleged crime, or who identified him as the perpetrator of other crimes.

11. It is requested that the prosecution disclose and supply to counsel for the accused any reports and results of any and all scientific tests, experiments and examinations made by experts or others the names of such persons who conducted the tests (including, but not limited to, such tests as: fingerprints, ballistics, blood, semen and other stains) pertinent to this case.

12. It is requested that the prosecution disclose to counsel for the accused whether any evidence was acquired as a result of the execution of any legal process, including a copy to be supplied to the defense for the purposes of inspection.

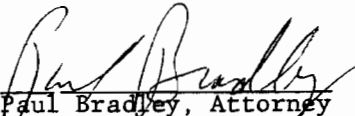
13. It is requested that the prosecution disclose to the defense the names and addresses of any witness or witnesses who may be or would be favorable to the defense. These witnesses should be clearly and separately identified on the List of Witnesses. The same disclosure is requested of any physical evidence, scientific evidence, reports or statements of experts, that might be or would be favorable to the defense.

14. Pursuant to Supreme Court Rule 415(b), it is requested that an order be entered upon the State to make such amendments

to their answer from time to time as may be required by new or modified information in their possession, knowledge or control. It is further requested, pursuant to Supreme Court Rule 412(f) that an order be entered upon the State to ensure that a flow of information is maintained between the various investigative personnel and its office sufficient to place within its possession or control all material and information relevant to the accused and the offense charged.

WHEREFORE, defendant respectfully requests this Honorable Court to enter an order requiring the prosecution to fulfill the aforesaid requests at the earliest reasonable time possible.

Respectfully submitted,



Paul Bradley, Attorney  
for Richard Woldow  
53 W. Jackson, #1220  
Chicago, Illinois 60604