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IN THE COURT OF COMMON PLEAS OF HENRY COUNTY, OHIO

STATE OF OHIO,	)	Case No. 15 CR 0082
Plaintiff	)	Judge: John S. Collier
vs.	)	<u>SUPPLEMENTAL RULE 16 DISCOVERY</u>
CULLEN A. PARSONS,	)	J. Hawken Flanagan (0088475)
Defendant	)	Henry County Prosecuting Attorney
	)	822 Oakwood Ave.
	)	P.O. Box 605
	)	Napoleon, Ohio 43545
	)	(419) 599-1010

Now comes the State of Ohio, by and through the undersigned counsel, and hereby submits Supplemental Discovery in compliance with Rule 16 of the Ohio Rules of Criminal Procedure as follows.

R. 16(B)(1) Any written or recorded statement by the defendant or a co-defendant, including police summaries of such statements, and including grand jury testimony by either the defendant or co-defendant

- Recordings of phone calls made by Defendant while incarcerated have been provided to counsel for Defendant.

R. 16(B)(2) Criminal records of the defendant, a co-defendant, and the record of prior convictions that could be admissible under Rule 609 of the Ohio Rules of Evidence of a witness in the state's case-in-chief, or that it reasonably anticipates calling as a witness in rebuttal

- Rolando Valle was convicted on February 27, 2008, in the Defiance Municipal Court on a single count of Misdemeanor Domestic Violence. Rolando Valle was arrested on August 18, 2015, and was charged in Defiance County with three counts of Trafficking in Drugs and a single count of Engaging in a Pattern of Corrupt Activity. This matter is still pending.



R. 16(B) (3) All laboratory or hospital reports, books, papers, documents, photographs, tangible objects, buildings, or places

- All laboratory reports generated through the subject investigation have been provided to counsel for Defendant. Copies of all photographs taken during the course of the investigation have been provided to counsel for Defendant. In addition, all tangible objects seized as evidence in this matter have been made available to counsel for Defendant.

R. 16(B) (4) Results of physical or mental examinations, experiments or scientific tests

- All laboratory reports generated through the subject investigation have been provided to counsel for Defendant.

R. 16(B) (5) Any evidence favorable to the defendant and material to guilt or punishment

- At this time, the State is not in possession of evidence favorable to Defendant's and material to his guilt or punishment.

R. 16(B) (6) All reports from peace officers, the Ohio State Highway Patrol, and federal law enforcement agents

- All law enforcement reports generated through the subject investigation have been provided to counsel for Defendant.

R. 16(B) (7) Any written or recorded statements by a witness in the state's case-in-chief, or that it reasonably anticipates calling as a witness in rebuttal

- Recorded Statements attributed to Charles Nash, Daniel Plotts, Jeremiah Lamb, Nick Badenhop, Rolando Valle, and Kyle Kern have been provided to counsel for Defendant. In addition, recordings of phone calls in which Aisya Kanard was a participant have been provided to counsel for Defendant, as well as the cell phone extraction reports for cell phones belonging to Cullen Parsons and Aisya Kanard. These extraction reports contained written messages attributed to Cullen Parsons and Aisya Kanard.

R. 16(I) The names and addresses of any witness the State intends to call in its case-in-chief, or reasonably anticipates calling in rebuttal or surrebuttal

- Kyle Kern, S873 County Rd 4, Liberty Center, Ohio; Ross Saneholtz, Henry County Sheriff's Office; Mark Glanz, Henry County Sheriff's Office; Shawn Wymer, Henry County Sheriff's Office; Kevin Carpenter, 7150 County Rd. C, Delta, Ohio; Arlen Cohrs, Henry County Sheriff's Office; Daniel Plotts, 123 S. Fulton Street, Wauseon, Ohio; Logan Schepeler, BCI London Office, 1560 State Rte 56 SW, London, Ohio;

Kevin Belcik, BCI Bowling Green Office, 750 North College Drive, Bowling Green, Ohio; Jeremiah Lamb, S-910 County Rd 4, Liberty Center, Ohio; Nick Badenhop, 18405 County Rd Q1, Napoleon, Ohio; Rolando Valle, 27450 Ayersville Ave., Apt. A, Defiance, Ohio; Craig Parsons, S-971 County Rd 4, Washington Township, Ohio; Aisya Kynard, 4860 Catalina Drive, Toledo, Ohio

R. 16(K) The names and addresses of any expert witnesses the State intends to call, including a written report summarizing the expert witness's testimony, findings, analysis, conclusions, or opinion, and a summary of the expert's qualifications

- Logan Schepeler, BCI London Office, 1560 State Rte 56 SW, London, Ohio; Kevin Belcik, BCI Bowling Green Office, 750 North College Drive, Bowling Green, Ohio
Reports generated by the above individuals have been provided to counsel for Defendant.

Respectfully Submitted,

J. Hawken Flanagan,
Prosecuting Attorney

CERTIFICATE OF SERVICE

I hereby certify the foregoing Responses to Discovery were served March 4, 2016, by personal service, to Loren Zaner, counsel for Defendant.

J. Hawken Flanagan,
Prosecuting Attorney