

*30 Questions for the Prosecutor to ask the lead detective
and/or for the defense to ask in deposition*

(Relative to Brady v. Maryland)

- 1) At any time during your investigation, did you consider any suspects other than the defendant? How did you eliminate them?
- 2) Has any person provided you any information of any kind that casts doubt on the guilt of the defendant?
- 3) Have you submitted any evidence for lab testing? What and when?
- 4) Have you sent or received any electronic communication relative to this case to anyone in law enforcement? To anyone outside LE?
- 5) Has any witness you have talked to started out telling you something that they later corrected, changed, altered, or took back?
- 6) Has any witness relative to this case contacted you by writing, email, or any other electronic means? What and where is that?
- 7) Are you in possession of any report, document, or other tangible paper that you have not given to the prosecutor?
- 8) Have you viewed and/or do you have any Facebook, Twitter, Instagram or any other social media relative to this case? What?
- 9) Have you received any information from a confidential source that has not been provided to the defense? (file motion if answer is yes)
- 10) Have you held back or failed to disclose any information that you consider confidential or work product? (file motion if answer is yes)
- 11) Are you aware of any information from any law enforcement source or any non-law-enforcement source about this case or the defendant that is not in your report?
- 12) Are you aware of any recorded statement made in relation to this case of the defendant or any other person, including controlled phone calls?
- 13) Have you run a criminal records check on any witness connected to this case? If yes, have you provided the results to the state?

- 14) Have you been provided any information of any kind from a source outside of law enforcement that you have not included in your report?
- 15) Have you reached out to any other law enforcement source for any information in connection with this case? What was sought?
- 16) Are you aware of any photographs or video relative to this case?
- 17) Have you conducted any surveillance relative to the investigation of this case or are you in possession or are you aware of any surveillance tape that has been made or collected in this case?
- 18) Are you aware of any forensic testing of any kind, including field tests, that were performed in relation to this investigation?
- 19) Have you conducted any reenactments relative to this case?
- 20) Have you recorded any event or person without those being filmed knowing that a recording was being made?
- 21) Have you shown any photographs to any witness in an effort to determine the identity of the alleged perpetrator in this case?
- 22) If yes, explain in detail the procedure that you used.
- 23) What exactly did you explain to the witness and what questions did the witness ask you?
- 24) Did the witness exhibit any hesitancy in the choice they made?
- 25) How long did the witness take in making their ultimate choice?
- 26) Did the witness ever ask you if they "chose correctly"?
- 27) Did you ever tell the witness that they made the right choice?
- 28) Did you ever tell any witness about the defendant's past or criminal record? If yes, who did you tell and what did you tell them?
- 29) Was any other person ever considered "a person of interest"? If yes, who and why?
- 30) What is your understanding of your obligations to turn over information relative to your investigation under the Supreme Court's decision in Brady v. Maryland? Explain.