

Kevin Riford  
3038 Michael Drive  
North Tonawanda, NY 14120

RECEIVED

DEC 09 2024

Wheatfield Law Court

December 7, 2024

Allison Contrera  
Niagara Falls Municipal Bldg.,  
1925 Main St.  
Niagara Falls, NY 14305

**Re: Request for Additional Discovery Materials**

Case No. 24100028

Dear Ms. Contrera,

I am writing to formally request additional discovery materials related to the above-referenced case. I believe that there are several items that have not yet been provided to me, and I respectfully request that they be disclosed as required under New York State law.

The following materials are specifically requested to ensure that I can properly prepare my defense:

**1. Expert Testimony and Reports**

- Any expert reports or summaries of testimony that the prosecution intends to use in this case, including but not limited to forensic experts, use-of-force experts, and psychiatric or psychological evaluations.

**2. Exculpatory Evidence (Brady Material)**

- Any evidence that may be favorable to my defense, including statements or documents indicating that I was not involved in the alleged offense or evidence that may undermine the prosecution's case.

**3. Police Training and Use-of-Force Policies**

- Any training materials provided to officers involved in my arrest, specifically regarding arrest procedures, use-of-force policies, and the handling of suspects.
- Documentation regarding the department's policies on the use of force.

**4. Internal Affairs Investigations**

- Any Internal Affairs reports or records relating to the officers involved in my arrest, including prior complaints or disciplinary actions.
- Any internal review reports concerning the use of force or the handling of this case by the officers involved.

**5. Chain of Custody Documentation**

- Complete chain of custody records for any evidence collected in my case, including any property seized during my arrest.

- A list or inventory of all items seized from me during my arrest or subsequent detention.

## **6. Additional Surveillance Footage or Audio/Video Records**

- Copies of any additional surveillance footage or audio from nearby cameras or other police officers, including dashcam footage or any video from other sources relevant to the case.
- Any 911 call recordings or dispatch logs relevant to the incident.

## **7. Witness Statements**

- Copies of all statements made by witnesses, including statements from bystanders, police officers, or any other individuals involved in or who observed the events surrounding my arrest.

## **8. Jail or Detention Facility Records**

- Any records from the detention facility where I was held after my arrest, including interactions with jail staff and any medical records from the time of my detention.

## **9. Prosecutor's Notes and Correspondence**

- Any notes, memoranda, or internal communications from the prosecution team relating to the case.
- Any correspondence between the prosecutor's office and law enforcement that may contain relevant information.

## **10. Plea Bargain Offers or Negotiations**

- Any documentation relating to plea offers or discussions related to the possibility of a plea bargain in this case.

## **11. GPS Data, Time Logs, and Officer Shift Records**

- Any GPS data, time logs, or shift records for the officers involved to verify their timeline and locations during the incident.

## **12. Witness List**

- A complete list of all witnesses the prosecution intends to call in this case, including the names and contact information of any individuals who may have witnessed the events surrounding my arrest or the alleged offense.

## **13. Forensic Evidence**

- Any forensic evidence related to the case, including but not limited to fingerprint analysis, DNA evidence, or any other physical evidence collected during the investigation or subsequent to the alleged offense.

**15. Police Officer Personnel Files**

- Relevant personnel files of the officers involved in my arrest, particularly those indicating prior complaints or misconduct.

**16. Body-Worn Camera Footage from Other Officers**

- Body-worn camera footage from additional officers involved in the incident, or any other recordings relevant to my case.

**17. Prior Convictions or Criminal History of Witnesses**

- Criminal history or prior convictions of witnesses to assess their credibility.

I request that these materials be provided as soon as possible to allow me sufficient time to review them. Should any of the requested materials be unavailable, I kindly ask that you inform me of their unavailability and provide an explanation for why they cannot be disclosed.

Thank you for your attention to this matter. I look forward to receiving these documents promptly. Please feel free to contact me if you require further clarification or if there are any issues in fulfilling this request.

Sincerely,



Kevin Riford