

STATE OF INDIANA) IN THE CARROLL CIRCUIT COURT
) ss:
COUNTY OF CARROLL) CAUSE NO. 08C01-2210-MR-000001

STATE OF INDIANA)
 Plaintiff)
 v.)
)
RICHARD ALLEN,)
 Accused)

LIST OF ADDITIONAL WITNESSES AND EXHIBITS FOR CONTEMPT HEARING

Comes now counsel for Attorneys Baldwin and Rozzi and notifies the State and the Court that in addition to all witnesses and exhibits previously disclosed he may call the following witnesses and offer the described exhibits:

Witnesses: Steven Wood; Angela Sadlowski; Julie Melvin; Teri Williams; Courtney Parsons and Matt Hoffman.

Exhibits: 1. Communications between Gary Beaudette a/k/a Fig a/k/a Figsolv and Prosecutor McLeland (multiple); 2. Communications from Beaudette about Prosecutor McLeland (4); 3. Anthony Greeno’s YouTube episode titled “CRIME NATION – Delphi Murders – WATCH AND REVIEW; 4. Rick Snay on True Crime Investigates; 5. Baldwin e-mail to McLeland re: Professor Turco report; 6. Beaudette’s communications with Angela Sadowski (2); 7. Beaudette’s you tube episode re: Delphi investigation; 8. Beaudette’s communications re: court staff revelations (7); 9. Beaudette’s communication re: disqualification of defense counsel; 10. Documentation of the relationship between Beaudette, Fortson and Cohen (2); 11. Beaudette sending defense work product to McLeland; 12. Beaudette sending information to McLeland; 13. Beaudette identifying source in Delphi investigation; 14. Beaudette posting re: sending information to McLeland; 15, Beaudette posting re: digging dirt on Baldwin; 16. Beaudette posting re: working with law enforcement and prosecution; 17. Beaudette email of McLeland

asking Beaudette to delete everything; 18. Barbara McDonald on Court TV with leaked investigation information; McLeland e-mail to defense re: Prof. Turco report; 19. Leaked search warrant affidavit prior to unsealing; 20. Sgt. Holeman communications with Teri Williams and/or “SecretKeeper”; 20. You Tubers “Frankmeister” and “Sleuth” video; You Tube “The Inquisitor True Crime” claiming leaked communications from Rick Allen; 21. Teri Williams posting about inside information of crime scene and of the investigation. 22. October 22, 2022, YouTube video of Baudette discussing his knowledge of a bullet at crime scene and knowledge that a gun was found at Rick Allen’s house when that information was still under seal and a week before unsealed; 23. E-mail exchange between Judge Gull and Attorney Rozzi re: accidentally misdirected e-mail; 24. Baldwin e-mail to Judge Gull 10-9-23; 25. List of media dissemination by State actors; 25. Julie Melvin documents and 26. You Tube video titled A Reckoning in Carroll County.

Potential Exhibits:

On or about February 29, 2024, and March 1, 2024, the defense received an anonymous call from a woman in Texas claiming to have approximately 240 pages of leaked documents and agreed to provide them. The defense has received only a few of those documents, all of which appear to be available to the public. The defense also discovered information from “The Prof” claiming that he had delivered “two pounds” of documents to the Indiana Attorney General. The defense is continuing to investigate that claim which may result in additional exhibits.

Respectfully Submitted,

/s/David R. Hennessy

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon all counsels of record at the time of filing.

/s/ DAVID R. HENNESSY

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