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Monday, December 02, 2024

To: Douglas Thompson Bates, IV
Attorney for Petitioner Zachary Rye Adams

**Discovery Response and
Reciprocal Discovery Request**
Zachary Rye Adams v. State of Tennessee
Hardin County Circuit Court
Case No. 17-CR-10-PC

This is the State's discovery response in the referenced case. If other discoverable information becomes available, it will be provided. The State's Demand for Notice and Reciprocal Discovery is found below.

Post-Conviction Discovery Materials

- All materials contained in State of Tennessee vs. Zachary Rye Adams case file, previously made available to Douglas Bates by ADA Jennifer Nichols;
- All materials obtained from Tennessee Administrative Office of the Courts by subpoena related billing records for Jennifer Thompson, Jim Simmons, and Jerry Gonzales, previously made available to Douglas Bates by ADA Jennifer Nichols;
- Tennessee Comptroller Comprehensive Report on Jennifer Thompson's Administrative Office of the Courts billing records related to all work performed/billed for State of Tennessee vs. Zachary Rye Adams. See attached **Exhibit "A"**.

WITNESSES: Witnesses for the State are listed below. Obviously, as the investigation continues and trial preparation begins, we may need to add witnesses. We will alert you if this occurs. Business and governmental records will be introduced based on affidavit (or certification) pursuant to Tenn. Rules of Evidence 902.

Jennifer Thompson	SA Brett Booth, TBI
Jim Simmons	Mitchell Hayes
Jerry Gonzales	Jennifer S. Nichols
SA Cathy Ferguson, TBI	Forrest Richardson, CPA, TN Comptroller Office

FILED 9 DAY OF Dec 2024 AT 12:45 PM
TAMMIE WOLFE, CLERK
BY Tami Wright, Deputy CLERK

**STATE'S DEMAND FOR NOTICE, INFORMATION AND
RECIPROCAL DISCOVERY**

In accordance with the *Tennessee Rules of Criminal Procedure* 12 and 16, local rules of court, other applicable rules and law, and applicable concepts of notice, fairness and due process, the State demands:

STATE'S RECIPROCAL DISCOVERY REQUEST: The State demands opportunity to inspect and copy all relevant documents and tangible objects over which the defendant exercises any possession, custody and control and/or which the defendant may attempt to introduce as evidence in this case. Likewise, the State requests opportunity to inspect and copy all reports of examinations and tests related to this case or the Defendant. Pursuant to law and professional courtesy, the State further requests to be informed of other relevant information and documentation of which the defendant or defense counsel is aware.

Sincerely,



Christopher Victor Boiano
Assistant District Attorney General

IMPORTANT PRIVACY NOTICE

Do not copy these documents and give them to your client. The State is obligated to provide defense counsel access to information in its file. We are glad to do so in the most effective and convenient way possible for you - by providing your own copy. However, parts of the enclosed documents are NOT APPROPRIATE FOR FURTHER DISSEMINATION. There are enclosed herein some information raising important privacy interests – such as criminal histories, social security numbers, etc. You have the choice of what to show your client and whether any documents should be copied for your client. If you provide your client copies, please redact any protected information. Please consider propriety, privacy interests of other individuals and applicable law. We are all licensed professionals and I hope you will judiciously use your discretion in your decision of which information and documents you share with your client, balancing your client's interests and the privacy interests of others.