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**IN THE FOURTH DISTRICT COURT
UTAH COUNTY, STATE OF UTAH**

STATE OF UTAH,

Plaintiff,

v.

BENJAMIN PAUL SCHNEIDER,

Defendant.

REQUEST FOR DISCOVERY

Case Number: 261401094

Honorable Judge Thomas Low

The defendant, pursuant to Rule 16 of the Utah Rules of Criminal Procedure and the Due Process Clauses of the Utah and United States Constitutions, requests that copies of the following materials be provided to defense counsel:

1. Any evidence which tends to negate the guilt of the defendant, mitigate the guilt of the defendant, or mitigate the degree of the offense, that has been discovered by any member of the agencies involved in the investigation or prosecution of the above-entitled case. See *Brady v. Maryland*, 373 U.S. 83 (1963); and Utah Rule of Criminal Procedure 16(a)(4).

2. Any evidence that has been discovered by any member of the agencies involved in the investigation or prosecution of this case that tends to inculcate the defendant.

3. A list of all law enforcement and/or civilian personnel who responded or investigated the above-entitled matter.

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4. If applicable, a list of all medical personnel involved in the above-entitled matter, including their names, telephone numbers, and addresses.

5. All police or investigative reports, follow-up investigation reports, daily logs, surveillance logs, property reports, chronology notes, and any other written materials, including any handwritten notes, whether or not those notes have formed the basis for a typed report, in the possession of any individual or agency involved in the prosecution of this case.

6. All field interview cards used to identify any individual(s) involved in the above-captioned matter.

7. All information, notices, or written memoranda disseminated during law enforcement roll calls, or personally relayed between law enforcement offices, regarding any surveillance, search warrant executions, the arrest, or any other matter pertaining to the investigation of this case.

8. Any training certificates or specialized certifications received by any law enforcement officer involved in the above-captioned matter.

9. Any reports made by non-governmental agencies involved in the investigation of this case, including reports made by any security personnel or any other agencies involved, and including any reports made by the alleged victim. See Utah Rule of Criminal Procedure 16(a)(5).

10. A list of all witnesses that the State intends to call for trial in the above entitled matter, their names, addresses, telephone numbers and their adult and juvenile criminal records. See Utah Rule of Criminal Procedure 4(j), and *Davis v. Alaska*, 415 U.S. 308 (1974).

11. Any offers of leniency or plea bargain agreements or any other form of remuneration provided to any of the witnesses. See *Giglio v. United States*, 405 U.S. 150

(1972).

12. The content of any statement made by any member of a governmental entity to the defendant, or to any witness, victim, or suspect, or to anyone in the defendant's presence, which was made in order to encourage the defendant to cooperate with a governmental entity, or which might reasonably be expected to have the effect of encouraging the defendant to cooperate or provide a statement to a governmental entity.

13. A copy of the booking sheet, booking photograph, and rap sheet (criminal record) of the defendant, if any. See Utah Rule of Criminal Procedure 16(a)(2).

14. Any written or recorded statements of the defendant or any witness interviewed during the investigation or prosecution of this case, as well as transcripts or reports about those statements.

15. Any video and/or audio recordings, as well as transcripts of those recordings, prepared in conjunction with the prosecution of this case.

16. Any statement of any person which was shown, read, played or paraphrased to the defendant, or to any witness, alleged victim, or suspect during any interview, interrogation, visit, and/or phone conversation.

17. Copies of all recordings and/or transcripts of any 911 calls pertaining to this case.

18. Identify by name, address, telephone number, and badge number the 911 operator(s) and dispatch officer(s) who responded to the 911 calls, and produce any police reports, officer notes, or documentation pertaining thereto.

19. Copies of all recordings and/or transcripts of any communications, including dispatch calls from law enforcement, fire department, or any other civilian agency pertaining to the above-entitled case.

20. Any statements made by the defendant to any of the State's witnesses and the dates, times, places, and persons when such statements were made.

21. Specify the date, time, and substance of any and all further contact between any investigating officer and the defendant, and any co-defendant or witness in the above-captioned matter.

22. Duplicates of all photographs, contact sheets from said photographs, digital photographs, drawings, diagrams, and video tapes in the possession of any law enforcement or governmental agency, regardless of whether or not those images are intended to be used by the prosecution at the time of trial.

23. Fully describe, by make, model, color, dimension, and service history, any camera, digital camera, or video camera used in the creation of items referenced in paragraph number 22.

24. Identify all clothing, including undergarments, of the defendant, and that of any witness, victim, or suspect, booked into evidence in this case.

25. Any physical evidence taken from the defendant, any co-defendant or witness, or the alleged crime scene in the above-entitled case, and any reports pertaining thereto. See Utah Rule of Criminal Procedure 16(a)(3).

26. For each piece of physical evidence identified in paragraph 25, please specify: (a) the custodian of said evidence, including their name, title, and contact information, (b) any reports or raw notes describing any of the physical evidence, and (c) each person to whom any of the physical evidence in this case was submitted to for analysis, including all criminalists, forensic scientists, DNA experts, handwriting experts, psychologists, etc.

27. Any and all documents regarding the chain of custody of any physical evidence,

including a description of the method of packaging and handling of the evidence at the time of recovery, at the time of booking it into evidence, and at the time of submission for analysis.

28. Any and all documentation regarding consent from any person to secure any physical evidence.

29. All officers' notes, police reports, and any other documentation pertaining to any request for laboratory analysis, or any other scientific testing, of physical evidence in the above captioned case.

30. Any tests, test results, chemical analyses, or any other scientific evidence and its attendant reports pertaining to this case, in the possession of any law enforcement or governmental agency, including handwritten notes made by the technician, even if not utilized in the making of the final report.

31. The defendant further requests that the State produce at trial the preparer of any scientific or laboratory report and all chain-of custody witnesses, for the purposes of cross-examination.

32. Pursuant to Utah Rule of Evidence 404(b), the defendant requests notice of any other crimes, wrongs, or acts the prosecutor intends to use in this case, and a list of exhibits and names and addresses of the witnesses the prosecutor intends to use to introduce the evidence of the other crimes, wrongs, or acts.

Finally, as provided in Utah Rule of Criminal Procedure 16(b), the prosecutor shall make all disclosures as soon as practicable following the filing of charges and before the defendant is required to plead. The prosecutor has a continuing duty to make disclosures.

DATED this 18th day of June 2026.

/s/ Jeremy M. Delicino

JEREMY M. DELICINO
Attorney for Defendant

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was electronically served on this
18th day of June 2026, to:

Utah County District Attorney's Office
Via Green File

/s/ Mary Schuman
