

IN THE TWENTY-FIRST JUDICIAL CIRCUIT COURT  
SAINT LOUIS COUNTY, MISSOURI

STATE OF MISSOURI	)	
	)	
Plaintiff	)	Cause No. 21SL-CR00998
	)	
v.	)	Div. 40
	)	
ANGELA FREINER	)	
	)	
Defendant	)	

**DEFENDANT’S REQUEST FOR DISCOVERY: MO. SUP. CT. R. 25.03**

Defendant, Angela Freiner, by and through counsel, Evita Tolu, requests the following material and/or information under Missouri Supreme Court Rule 25.03 and without Court order, to be disclosed by the state to Defendant’s counsel within fourteen (14) days after service of this request:

(1) Any arrest reports, incident reports, investigative reports, written or recorded statements, documents, photographs, video, electronic communications, and electronic data that relate to offense for which Defendant is charged;

(2) Any material or information that tends to negate the guilt of Defendant for the charged offense, mitigate the degree of the offense charged, reduce the punishment of the offense charged, and any additional material or information that would be required to be disclosed to comply with *Brady v. Maryland*, 373 U.S. 83 (1963), *Giglio v. United States*, 405 U.S. 150 (1972) and their progeny. If any of this material or information is in the possession or control of other government personal, the state shall use diligence and make good faith efforts to make the material or information available to defendant.

If after complying with this request for disclosure, the state discovers information or material that the state would have been required to disclose under this request, the state shall furnish this additional information or material to defense counsel as soon as practicable.

Respectfully submitted,

/s/ Evita Tolu

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 1 day of April, 2021, a true and accurate copy of the foregoing was sent through the Missouri electronic filing system to counsel of record.

/s/ Evita Tolu