

STATE OF INDIANA	)	IN THE SUPERIOR COURT #2
	) SS:	
TIPPECANOE COUNTY	)	OF TIPPECANOE COUNTY
	)	
STATE OF INDIANA	)	
	)	
V.	)	CAUSE NO. 79D02-1401-MR-1
	)	
CODY M. COUSINS	)	

2014 FEB 24 PM 2:02

STATE'S DISCOVERY DISCLOSURES

Comes now the State of Indiana by Matthew Lasher, its Deputy Prosecuting Attorney, and submits the following discovery disclosures to the Defendant.

1. The State may call any one or more of the following persons as witnesses:

Officer Edwards, PUPD
 Officer Snider, PUPD
 Officer White, PUPD
 Lieutenant Moore, PUPD
 Lieutenant Wiete, PUPD
 Detective Boesch, PUPD
 Detective Sergeant Costello, PUPD
 Detective Sergeant Rosenbarger, PUPD
 Detective Sergeant Wietbrock, PUPD
 Detective Lieutenant Davis, PUPD
 Captain Chin, PUPD
 Chief Cox, PUPD
 Officer Coomey, WLPD
 Officer Hartman, WLPD
 Officer Spicer, WLPD
 Officer Spray, WLPD
 Officer Winslow, WLPD
 Detective Greene, WLPD
 Detective Marion, WLPD
 Detective Townsend, WLPD
 Lieutenant Harris, WLPD
 Captain Martin, WLPD
 Detective Amberger, TCSO
 Detective Caldwell, TCSO
 Detective Couch, TCSO
 Detective Goldsmith, TCSO
 Detective Swartz, TCSO

Detective Russell, ISP
 Master Trooper Harper
 Sergeant Cody, ISP
 Sergeant Datzman, ISP
 Sergeant Langland, ISP
 Special Agent Emmons, BATFE
 Investigator Leshney, TCPO
 Investigator Tajc, TCPO
 Scott Ksander
 Tippecanoe Emergency Ambulance
 Service personnel
 Coroner Avolt
 Deputy Coroner Brooks
 Deputy Coroner Jasheway
 Dr. E. Allen Griggs
 Byungchan An
 Adam Bahrainwala
 Stefan Brinton
 Qingshuang Chen
 Chvqi Dai
 Alex Erbach
 Alec Funke
 Allen Glass
 Felicia Goh
 Manish Gupta
 Xiaofan Jiang
 Fouad Khoury
 Daniel Klanke

Seonggyeong Lee
Anubha Mathur
Austin Nobis
Thomas Norling
Eshamogbo Ojuba
Andrew Pawling
Christopher Pierson
Michael Price
Pranav Rao
Eric Schrock
Andy Shi
John Sterrett
Jacob Stevens
Samuel Stevenson
Matthew Swabey
Kyle Thackston
Timothy Trippel
Steven Verhalen
Nicholas Wieland
Todd Wild
Alyssa Williams
Adam Worthington
Yixuan Xu
Jiaye Zhang
Amanda Schultz
Cody Price
Dennis Lazar
Morgan Redemann
Madeline Zimmerman
Dorene Bick
Jennifer Blue
Cordelia Brown
Carlena Cambridge
Damon Clevenger
William Crabill, Jr.
Nikhil Devarakonda
Bryce Edwards
Trevor Favor

Karen Fraser-Mills
Vignesh Gouthaman
Shicheng Guo
Tiffany Hall
Stephen Hislope
Mary Leffert
Daniel Marocco
Neil Merchant
Lisa Mitton
Daniel Marocco
Andrew Mayasovski
Kelly Meding
Josh Nichols
Thomas Novak
Christopher Purdy
Tairan Qiu
Angela Rainwater
Saverio Rotella
Mubarak Singh
Brittany Stansberry
Joshua Wiedder
Jun Zhang
Thomas Daly
Deana Marshall
Daniel Quesenbery
Dave Schnelle
Francis Zakrajsek
ISP Laboratory Forensic Scientists
Representative from Tippecanoe County
MITS/GIS
Any person involved in the Defendant's
prior police contacts
Any person involved in the chains of
custody
Any person listed in the police reports
Any person listed by the defense
Any person necessary for rebuttal or
impeachment purposes

2. The State may offer any one or more of the following as exhibits:

PUPD case report 2014-000059
WLPD case report 2014-000240
TCSO case report 2014-000327
ISP case report 14ISPC000525
WLPD case report 2011-001201
WLPD case report 2012-000111

Event reports
911 calls
Video recordings of witness statements
Audio recordings of witness statements
In-car camera video recordings
S&W .38-caliber model 642 revolver

Gerber knife
 Bullet casings
 Floor tiles
 Blood swabs from shoeprints
 Blood swabs from Cody Cousins
 Weatherproof-brand jacket
 Cody Cousin's shoes and clothing
 Photograph from witness's mobile phone
 Photographs of scene and victim
 Photographs of Cody Cousins at PUPD
 and TCJ
 Photogrammetry rendering
 Schedule from outside of Room 67
 Sketches of Room 67
 Diagram of Electrical Engineering
 building
 Electrical Engineering building security
 camera videos
 Autopsy photographs
 Autopsy X-ray images
 Autopsy diagrams / sketches
 Autopsy report
 Bullet fragments
 ISP Laboratory Division Certificate(s) of
 Analysis
 Lease for 333 W. Stadium Avenue
 Video of apartment during search
 Photographs of seized items from search
 HP and Compaq laptop computers and
 any files from them
 WD and Maxtor external hard drives and
 any files from them
 Motorola mobile phone and any of its
 contents
 PNY flash drives and any files on them

Boardroom series notebook / journal
 Black notebook
 ECE 270 lab schedule printout
 Smith and Wesson box
 Test fire .38-caliber casing
 .38-caliber cartridges and tray
 Wallet and cards
 Chain of custody form
 ATF Form 4473
 Video recordings from Applied
 Ballistics
 Applied Ballistics receipts, registration,
 agreement, and sign-in sheet
 Padlock and key
 Circle K employment application
 Lease from Cochran Apartments
 Lease from Willowbrook West
 Apartments
 Lease from McCormick Place
 Apartments
 Purdue University employment / HR
 records
 Purdue University Housing records
 Purdue University Registrar records
 Purdue University Dean of Students
 records
 Purdue University ITaP records
 Class schedules
 Maps / sketches / diagrams
 Certified BMV records
 Certified court records from 79D04-
 1201-CM-61
 Fingerprint cards
 Any items listed in the police reports

3. The State advises that the following recorded or written statements were taken by police during investigation:

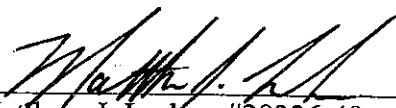
Cody Cousins (PUPD, video, 1/21/14)
 Adam Bahrainwala (TCSO, video, 1/21/14)
 William Crabill, Jr. (ISP, audio, 1/21/14)
 Alec Funke (WLPD, video, 1/21/14)
 Felicia Goh (TCSO, video, 1/21/14)
 Vignesh Gouthaman (PUPD, video, 1/21/14)
 Xiaofan Jiang (WLPD, video, 1/21/14)
 Fouad Khoury (WLPD, video, 1/21/14)

Daniel Klanke (WLPD, video, 1/21/14)
 Dennis Lazar (Two sessions at PUPD, video, 1/21/14)
 Anubha Mathur (TCSO, video, 1/21/14)
 David Meyer (Residence, audio, 1/21/14)
 Andrew Pawling (PUPD, video, 1/21/14)
 Christopher Pierson (TCSO, video, 1/21/14)
 Tariran Qiu (PUPD, video, 1/21/14)
 Pranav Rao (TCSO, video, 1/21/14)
 Eric Schrock (TCSO, video, 1/21/14)
 John Sterrett (WLPD, video, 1/21/14)
 Jacob Stevens (TCSO, video, 1/21/14)
 Timothy Trippel (PUPD, video, 1/21/14)
 Todd Wild (PUPD, video, 1/21/14)
 Jun Zhang (PUPD, video, 1/21/14)
 Jiaye Zhang (WLPD, video, 1/21/14)
 Austin Nobis (PUPD, video, 1/22/14)
 Daniel Quesenbery (ABS, audio, 1/22/14)
 Francis Zakrajsek (ABS, audio, 1/22/14)
 Thomas Daly (ABS, audio, 1/23/14)
 Cordelia Brown (ISP, audio, 1/23/14)
 Adam Worthington (PUPD, video, 1/24/14)
 Stephen Hislope (In-car, audio, 1/27/14)
 Nikhil Devarakonda (In-car, audio, 1/28/14)
 Andrew Matyasovki (In-car, audio, 1/28/14)
 Thomas Novak (In-car, audio, 1/28/14)
 Saverio Rotella (In-car, audio, 1/28/14)
 Mubarak Singh (Residence, audio, 1/28/14)
 Tiffany Hall (In-car, audio, 1/29/14)
 Mari Leffert (PUPD, video, 1/29/14)
 Daniel Marocco (In-car, audio, 1/29/14)
 Brittany Stansberry (Residence, audio, 1/29/14)
 Joshua Wiedder (In-car, audio, 1/29/14)
 Dorene Bick (PUPD, video, 1/30/14)
 Carlana Cambridge (Residence, audio, 1/30/14)
 Jennifer Blue (Two telephone recordings, audio, 2/11/14)
 Madeline Zimmerman (PUPD, video, 2/11/14)
 Cody Price (Telephone recording, audio, 2/14/14)
 Morgan Redemann (PUPD, video, 2/14/14)
 Byungchan An (Written, 1/21/14)
 Stefan Brinton (Written, 1/21/14)
 Qingshuang Chen (Written, 1/21/14)
 Chvetai Dai (Written, 1/21/14)
 Alex Erbach (Written, 1/21/14)
 Alec Funke (Written, 1/21/14)
 Allen Glass (Written, 1/21/14)
 Manish Gupta (Written, 1/21/14)
 Seonggyeong Lee (Written, 1/21/14)
 Thomas Norling (Written, 1/21/14)

Eshamogbo Ojuba (Written, 1/21/14)
Michael Price (Written, 1/21/14)
Andy Shi (Written, 1/21/14)
Samuel Stevenson (Written, 1/21/14)
Matthew Swabey (Written, 1/21/14)
Kyle Thackston (Written, 1/21/14)
Steven Verhalen (Written, 1/21/14)
Nicholas Wieland (Written, 1/21/14)
Alyssa Williams (Written, 1/21/14)

4. The State is not presently aware of any impeachable offenses for the anticipated witnesses. The State will promptly inform the Defendant through a supplemental discovery disclosure if any such offenses are found.
5. The State reserves the right to supplement or amend its discovery disclosures as the investigation and case preparation continues.

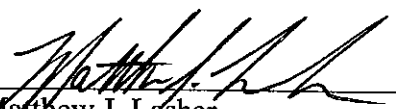
Respectfully submitted,


Matthew J. Lasher, #29336-49
Deputy Prosecuting Attorney
23rd Judicial Circuit
Courthouse, 301 Main St.
Lafayette, Indiana 47901
(765) 423-9305

CERTIFICATE OF SERVICE

I hereby certify that on the date of filing, a copy of the foregoing was served upon each party or attorney of record herein either personally or by United States first class mail, postage prepaid in envelopes properly addressed, or in Tippecanoe County Courthouse mailbox.

Robert Geevers
Attorney of record


Matthew J. Lasher
Deputy Prosecuting Attorney