

# PATRICK MICHAEL MEGARO

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September 12, 2009

ADA Richard Martell  
Nassau County District Attorney's Office  
99 Main Street  
Hempstead, New York 11550

**Re:** People v. Ducmel Denis  
**Docket #** 2008NA0133184 & 2008NA0133815  
**Adj. Date/Part:** 10/2/09 – Part 3

Dear Mr. Martell:

As you know, I represent the Defendant in the above-referenced action. This letter is to request that you produce the following materials, pursuant to Brady v. Maryland, 373 U.S. 83 (1963) and its progeny:

- all documents, notes, memoranda, reports, statements, accounts, etc. concerning the investigation of the Nassau County Police Department Internal Affairs Bureau and the Nassau County District Attorney's Office Public Integrity Bureau, or other-named bureau, concerning the investigation into the use of force against the Defendant during his arrest which resulted in injuries to the Defendant

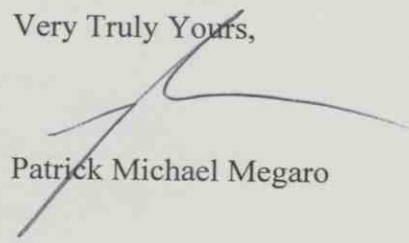
In addition to the foregoing, please provide me with all internal documents of the District Attorney's Office related to the investigation and prosecution of these police officers. **I am requesting that these documents be made available to me at least 1 week before the scheduled trial date, which is October 2, 2009.**

In addition, I am seeking to have my client evaluated by a forensic psychologist, Dr. Marc Janoson, whose curriculum vitae is attached. Depending on the results of that evaluation, I may call Dr. Janoson as an expert witness to testify in the following areas: psychological impact of the attack of police, post-traumatic stress disorder, lack of

culpability by reason of mental disease/defect, in addition to any mitigating factors in aid of sentencing, should the need arise.

Should you have any questions please feel free to contact me at the above telephone number. Thank you.

Very Truly Yours,



Patrick Michael Megaro

CC:  
Clerk of the Court  
Nassau County District Court  
99 Main Street  
Hempstead, New York 11550