

HON. DAVID REES

IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

STATE OF OREGON,

PLAINTIFF,

vs.

JOEY GIBSON,

DEFENDANT.

No. 19CR53042

JOSEPH GIBSON'S
DEMAND FOR DISCOVERY
SUPPLEMENTAL NUMBER 1

SUPPLEMENTAL DEMAND FOR DISCOVERY

The defendant, Mr. Joseph Gibson, by and through the Angus Lee Law Firm, PLLC having previously requested discovery, makes the following supplemental demands for discovery:

1. Flight video from Daniel Barnard (as referenced in discovery);
2. All emails from Juan C Chavez to Det. Traynor (as referenced in discovery);
3. All emails from Crystal Pritchett to Det. Traynor (as referenced in "Crystal Int 050819.mp3");
4. Video taken by Fred Saupe (as referenced in discovery);
5. Officer's report from the second plain clothes officer on scene (as referenced in discovery);
6. Recording of interview of Robert West (as referenced in discovery);
7. Recording of interview of Chris Ponte (as referenced in discovery);

- 1 8. The Incident Command / Crowd Control plan for May 1, 2019; and the debriefing or after-
2 action report for May 1, 2019;
- 3 9. The roster of those assigned to crowd control or other special assignments related to the
4 May 1, 2019 demonstrations, including times reported on-duty and off-duty, and duty
5 assignments;
- 6 10. All audio recordings of the Incident Command center on May 1, 2019;
- 7 11. Any medical records showing any injury to Heather Clark;
- 8 12. Recordings of all radio traffic on all police, fire, and EMS frequencies, starting for 2 hours
9 before the first report of an incident at Cider Riot, until 2 hours after the incident was
10 reported as cleared;
- 11 13. All documents at the "Fusion Center" referring to Joey Gibson, Patriot Prayer, Cider Riot,
12 or Luis Marquez.
- 13 14. All written materials shared with OLCC in connection with its investigation of the events
14 at Cider Riot.
- 15 15. All written communications between the Portland Police Bureau and OLCC Investigator
16 Genny Welp.
- 17 16. All written communications between any member of the Portland Police Bureau or the
18 Multnomah County District Attorney concerning redaction of the OLCC report.
- 19 17. All information available concerning the destruction of evidence by Cider Riot owner
20 Abram Goldstein-Armstrong as reflected in the OLCC report.

21 YOU ARE HEREBY NOTIFIED that failure to comply with the demands contained herein
22 will result in defendant, Joey Gibson moving for appropriate relief at time of hearing or trial.

Respectfully submitted this Tuesday, September 24, 2019.

/s/ D. Angus Lee

D. Angus Lee, WSBA# 36473 *Pro Hoc Vice*

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Attorney for Defendant JOSEPH “JOEY”

GIBSON

/s/James L. Buchal

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Attorney for Defendant JOSEPH “JOEY”

GIBSON

DEMAND FOR DISCOVERY (SUPP 1)

No. 19CR53042

Tuesday, September 24, 2019

ANGUS LEE LAW FIRM, PLLC

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1 **CERTIFICATE OF SERVICE**

2
3 I, D. Angus Lee, hereby declare under penalty of perjury under the laws of the State of
4 Oregon that the following facts are true and correct:

5
6 I am a citizen of the United States, over the age of 18 years.

7
8 On Tuesday, September 24, 2019, I caused this document to be served in the following
9 manner on the parties listed below:

10
11
Brad Kalbaugh () (BY FIRST CLASS US MAIL)
Multnomah County District Attorney's Office (X) (BY E-MAIL)
600 Multnomah County Courthouse () (BY FAX)
1021 SW 4th Ave () (BY HAND)
Portland OR 97204
E-mail: brad.kalbaugh@mcda.us

/s/ D. Angus Lee