

Exhibit C



City of Manchester
Office of the City Solicitor

One City Hall Plaza
(603) 624-6523 Fax (603) 624-6528
TTY: 1-800-735-2964
E-Mail: solicitor@manchesternh.gov

Thomas R. Clark
City Solicitor
Thomas A. Arnold
Deputy City Solicitor

Gregory T Muller
John G Blanchard
Jeremy A Harmon

TO: George Campbell, Esquire
FROM: Jeremy A Harmon, Esquire
RE: STATE vs. Theresa Petrello
DATE 8/18/15

Pursuant to your request, in reply to your request for discovery, you are provided with the enclosed information.

- ☒ Police reports and other materials as required by District Court Rule 2.10.
- ☐ Motor Vehicle Record.
- ☐ Lab Results
- ☐ _____

The foregoing evidence, or any part thereof, will be offered at the trial or at any hearing. Pursuant to District Court Rule 2.10B, please be advised that the State anticipates calling each witness named in the attached discovery.

In addition, please consider this letter as a request for reciprocal discovery pursuant to State v. Drewry, 139 NH 678 (1995) and State v. Chagnon, 139 NH 671 (1995), including but not limited to the following information:

- a. A list of all witnesses who will testify at trial, including their addresses and dates of birth.
- b. A copy of any written statements signed by a witness that pertains to their testimony, or unsigned "statements which are written recollection of events that the witness is expected to testify about at trial.
- e. A list and copies of any tangible objects, papers, documents, photographs, books or other items that shall be offered as evidence at trial.
- d. As to expert witnesses, a report of their theories and opinions and basis for them.

PLEASE ADVISE AS TO WHETHER YOU WILL PROVIDE THIS INFORMATION TEN DAYS PRIOR TO TRIAL SO THAT THE STATE MAY FILE A MOTION IF NECESSARY

Docket # 45615-03525 TN # 10918638

The State of New Hampshire
COMPLAINT

CASE #: 15-008247

☒ VIOLATION ☐ CLASS A MISDEMEANOR ☐ FELONY
☐ CLASS B

YOU ARE TO APPEAR BEFORE THE COURT LISTED BELOW
AT 08:15 O'CLOCK IN THE AM/PM ON July 9 YR. 2015
UNDER PENALTY OF LAW TO ANSWER TO A COMPLAINT
CHARGING YOU WITH THE FOLLOWING OFFENSE:

TO THE 9th Cir-C Manchester Dist COURT, COUNTY OF Hillsborough

THE UNDERSIGNED COMPLAINS THAT: PLEASE PRINT

NAME Petrillo, Theresa
Last Name First Name MI

714 Belmont ST Manchester NH 03104
Address State Zip

DOB 11/28/1961 OP. LIC.#

WRITE OUT:
Sex 501 Race 180 Color of Hair BLN Color of Eyes BLU

☐ COMM. VEH. ☐ COMM. DR. LIC. ☐ HAZ. MAT. ☐ 16+ PASSENGER

AT Maple Street in Manchester
(Location)

ON THE 3 DAY OF June YR. 2015 at 10:00 P.M.

on/at in said county and state, did commit the offense of

Disorderly Conduct - Haz Condition contrary to RSA 644:21

and the laws of New Hampshire for which the defendant should be held to
answer, in that the defendant did

knowingly create a condition which was hazardous to himself or another in a
public place by an action which served no legitimate purpose when she held a
sign chest high while standing on the sidewalk that said "veteran" which
resulted in a vehicle stopping so that it's driver could give the subject some
money

against the peace and dignity of the State.

☐ SERVED IN HAND

Chief David J. Mara Badge # A1 Manchester PO 12201
Complainant Printed Name Dept.

Making a false statement on this complaint may result in criminal prosecution.

Oath below not required for police officers unless complaint charges class A misdemeanor or felony (RSA 592-A:7, I).

Personally appeared the above named complainant and made oath that the above
complaint by him/her subscribed is, in his/her belief, true.

DATE 8/17/2015
Justice of the Peace

103A-045 5/13

POLICE COPY

PET002

SUMMONS

**STATE OF NEW HAMPSHIRE
CITY OF MANCHESTER
MANCHESTER DISTRICT COURT**

CASE # 15-9247

TO: Yheresa Petrello D.O.B. 11/26/61

F W 5'1" 160 BLU BLN
SEX RACE HEIGHT WEIGHT COLOR EYES COLOR HAIR

OF (NO. P.O. BOX OR RFD#) 714 Belmont St, Manchester NH

YOU ARE HEREBY NOTIFIED TO APPEAR BEFORE THE MANCHESTER NEW HAMPSHIRE DISTRICT COURT
35 AMHERST STREET, MANCHESTER NEW HAMPSHIRE TO BE HELD

ON 7/9/15

AT 0815 AM IN THE FORENOON TO ANSWER A COMPLAINT CHARGING YOU
WITH Disorderly Conduct R/A 644.2 (V)

IN VIOLATION OF THE LAWS OF THE STATE OF NEW HAMPSHIRE AND OR CITY ORDINANCES

DO NOT FAIL TO APPEAR, OR YOU WILL ANSWER YOUR DEFAULT UNDER THE PENALTY PRESCRIBED BY
LAW. UPON FAILURE TO APPEAR, A WARRANT MAY BE ISSUED FOR YOUR ARREST. WILLFUL FAILURE TO
APPEAR IN ANSWER TO SUCH SUMMONS MAY BE PUNISHED AS PRESCRIBED BY LAW.

ISSUED 6/3/15

BY Brandrick #31

SERVED IN HAND THIS DATE 6/3/15 AT 1615 TIME

Brandrick #31
POLICE OFFICER

MPDFORM94

WHITE-master file

YELLOW-court file

PINK-defendant

PET003

Incident/Investigation Report

Agency: MPD

Case Number: 15-009247

Date: 08/04/2015 13:39:25

Incident Information

Date/Time Reported 06/03/2015 16:08	Date/Time Found 06/03/2015 16:05	Date/Time Found 06/03/2015 16:08	Officer (100321) BRANDRETH, RYAN J
Incident Location Bridge St / Maple St, Manchester, NH 03104			

Charges

1	Charge Type State	Description DISORDERLY CONDUCT (V)	Statute 644:2 (V)	UCR 90C	☐ Att ☒ Com
Alcohol, Drugs or Computers Used ☐ Alcohol ☐ Drugs ☐ Computers		Location Type HIGHWAY/ROAD/ALLEY	Premises Entered	Forced Entry ☐ Yes ☒ No	
Weapons 1.		2.			
3.					
Entry	Exit	Criminal Activity		Hate Group	
Bias Motivation		Bias Target	Bias Circumstances		

Victims

Seq. # 1	Type GOVERNMENT	Injuries None	Residency Status Unknown	Ethnicity Unknown	
Name (Last, First, M) STATE OF NEW HAMPSHIRE			Race U	Sex U	DOB
Address 405 VALLEY ST, MANCHESTER, NH 03103			Home Phone (603) 668-8711		
Employer Name/Address			Business Phone		
Victim of Crimes 1					

Incident/Investigation Report

Agency: MPD

Case Number: 15-009247

Date: 08/04/2015 13:39:25

Offenders

Seq. # 1	Type INDIVIDUAL	Name (Last, First, M) PETRELLO, THERESA M					
AKA		Race W	Sex F	DOB 11/26/1961...	Age 53	Height 5'01" - 5'01"	Weight 158 -...
Address 714 BELMONT ST, MANCHESTER, NH 03104						Home Phone (603) 867-5426	
Employer Name/Address						Business Phone	
Scars, Marks, Tattoos or other distinguishing features Scars/Scars Scars-Abdomen, Scar							
Physical Characteristics							

Suspect Details

Assisting Officers

(100413) K9-COLT, OFC BIRON
(100457) MCKENNEDY, SHAUN M

Notes/Narrative

(100321) BRANDRETH, RYAN J

MO: Female panhandler issued summons for DOC after vehicles stopped in traffic.

RSA 644:2 Disorderly Conduct (V)

On 6/3/15 at approx 1600hrs I (Ofc Brandreth) was at a business check at the Seven Eleven located at 557 Maple St when my attention was drawn to a panhandler. The panhandler was holding a large cardboard sign at chest level that said "Veteran" and had smaller writing underneath it. She was standing on the grass between the sidewalk and the roadway on the west side of Maple St approx 15 feet south of Bridge St. Maple St is a 2 lane one way street at that point heading north. The panhandler was standing with her back to the traffic control device while facing northbound traffic.

While watching her I saw approx 7 vehicles hand her items. During a green light cycle for vehicles traveling north on Maple St a black Cadillac came to a complete stop and handed her something. The vehicle then traveled north through the intersection. The vehicle behind it, NH 931, a 2011 Jeep Grand Cherokee color gray, had to stop because the Cadillac stopped. The light turned red and the Cherokee was unable to make it through the intersection. If the Cadillac had not stopped, the Cherokee would have made it through on the green light cycle

Incident/Investigation Report

Agency: MPD

Case Number: 15-009247

Date: 08/04/2015 13:39:25

and would not have had to wait for the next light cycle.

I approached the female and she said that I needed to stop harassing her and she was calling the ACLU. She said that she was going to record me with her phone and told her there was no problem with that. I explained to her that she could not stop vehicles and she said that she did not stop anyone. I asked for her identification and she provided me a NH Drivers license. She was identified as

Theresa Petrello
11/26/61
714 Belmont St, Manchester

I returned to my cruiser and checked our in house contacts with THERESA. I located a summons she was issued on 5/15/15 from Sgt Laroche for Pedestrian in the Roadway, an offense I know is often related to panhandling.

I issued THERESA a white summons to appear in Manchester District Court, 9th Circuit on 7/9/15, for one count of Disorderly Conduct (Violation) RSA 644:2, for obstructing vehicular traffic.

NFI/RJB

User: GMCCARTH

Manchester Police Department

07/08/2015 08:17:58

RAP Sheet

Petrello, Theresa M

Case	Agcy Arrest ID	Arrest Date	Charge	Disposition
15-009247	MPD 15-002560	06/03/2015	DISORDERLY CONDUCT (V) 070915	PENDING COURT

From: City of Manchester Solicitors

08/19/2015 17:08

#307 P.008/010

User: GIMCARTH

Manchester Police Department

07/08/2015 08:17:59

RAP Sheet

Petrello, Theresa M

Date	Type	ID	Agency	Description
06/03/2015	Case	15-009247	MPD	OFFENDER - DISORDERLY CONDUCT (V)
08/20/2014	Accident	14-012496	NPD	DRIVER
05/15/2015	Citation	2015-43029	MPD	PEDESTRIAN ON HIGHWAY - SENT TO CONCORD

R_Rap3b

Jul 8, 2015 8:18:54 AM

Printed By: MCCARTHG60 from: MANCH-REC

Received Time: 08:24:12 07-08-15 Source ORI: NHCHS0000
Summary: FQ: PUR=C SID=869172
View Message Details

THIS RESPONSE IS THE RESULT OF YOUR INQUIRY ON:
PUR/C.ATN/PELLETIER.SID/869172

BECAUSE ADDITIONS OR DELETIONS MAY BE MADE AT ANY TIME A NEW COPY
SHOULD BE REQUESTED FOR SUBSEQUENT USE.

ARREST DATA WHICH STATE "NOT REPORTED" ARE NOT SUPPORTED BY FINGERPRINTS.

FOR LAW ENFORCEMENT USE ONLY - UNAUTHORIZED USE OF THIS RECORD IS PROHIBITED -
DO NOT DISSEMINATE TO ANY UNAUTHORIZED PERSONS

SID/869172 FBI/
NAME/PETRELLO, THERESA M DOB/19611126 SEX/F RACE/W
EYE/BLU HAIR/BRO WGT/160 HGT/501
FPC/

* * * ARREST RECORD * * *

ORIGINAL CHARGE/NOT REPORTED

TYPE/ CLASS/

DV ARREST/N VAW/N CAC/N

TRACK NO/

VIOLATION DATE/20150603 END DATE/ ON OR ABOUT/N

ARREST DATE/ AGENCY/MANCHESTER ORI/NH0063400

COMPLAINT AS FILED OFFENSE/DISORDERLY CONDUCT

TYPE/VIOLATION CLASS/

DV COMPLAINT/N

COMMENT/

- - - DOCKET RECORD - - -

COURT DATE/ COURT/MANCHESTER-D ORI/NH006061J

DOCKET/456-2015-CR-03525 COURT CHARGE ID/1091868C

DISPOSED OFFENSE/

TYPE/ CLASS/

PLEA/ FINDING/

SENTENCE/

GOOD BEHAVIOR/ PERIOD/

PROBATION/

CONFINED/ APPEAL/ FINE/ INDICTED/

QUALIFYING MISDEMEANOR CRIME OF DV/N RELATIONSHIP/

IN CHS NBR 344 AT 08JUL2015 08:24:11

OUT MANCH-REC NBR 77 AT 08JUL2015 08:24:12 MSG 026941/08JUL2015 08:24:12

Received Time: 08:24:12 07-08-15 Source ORI: NH0063404
Summary: FQ: PUR=C SID=869172
View Message Details

Message Accepted - MRI 26940 MANCH-REC 29 at 07/08/2015 08:24:11

Jul 8, 2015 8:19:40 AM

Printed By: MCCARTHG60 from: MANCH-REC

Received Time: 08:24:46 07-08-15
Summary: QH: NAM=PETRELLO, THERESA SEX=F
View Message Details

NL01QH GM
NH0063404
NO IDENTIFIABLE RECORD IN THE NCIC INTERSTATE IDENTIFICATION INDEX (III)
FOR NAM/PETRELLO, THERESA.DOB/19611126.SEX/F.RAC/W.PUR/C.ATN/PELLETIER.
END
IN NCIC NBR 5505 AT 08JUL2015 08:24:46
OUT MANCH-REC NBR 80 AT 08JUL2015 08:24:46 MSG 027018/08JUL2015 08:24:46

Received Time: 08:24:46 07-08-15
Summary: QH: NAM=PETRELLO, THERESA SEX=F
View Message Details

1L01QW GM
NH0063404
NO NCIC WANT NAM/PETRELLO, THERESA DOB/19611126 SEX/F
***MESSAGE KEY QW SEARCHES WANTED PERSON FILE FELONY RECORDS REGARDLESS OF
EXTRADITION AND MISDEMEANOR RECORDS INDICATING POSSIBLE INTERSTATE
EXTRADITION FROM THE INQUIRING AGENCY'S LOCATION. ALL OTHER NCIC PERSONS
FILES ARE SEARCHED WITHOUT LIMITATIONS.
IN NCIC NBR 5504 AT 08JUL2015 08:24:46
OUT MANCH-REC NBR 79 AT 08JUL2015 08:24:46 MSG 027017/08JUL2015 08:24:46

Received Time: 08:24:46 07-08-15 Source ORI: NHCHS0000
Summary: QH: NAM=PETRELLO, THERESA SEX=F
View Message Details

THIS RESPONSE IS THE RESULT OF YOUR INQUIRY ON:
NAM/PETRELLO, THERESA.DOB/19611126

FOR LAW ENFORCEMENT USE ONLY - UNAUTHORIZED USE OF THIS RECORD IS PROHIBITED -
DO NOT DISSEMINATE TO ANY UNAUTHORIZED PERSONS

* * * MATCHED RECORD * * *
SID/869172 FBI/
NAME/PETRELLO, THERESA M DOB/19611126 SEX/F RACE/W
EYE/BLU HAIR/BRO WGT/160 HGT/501
FPC/

IN CHS NBR 345 AT 08JUL2015 08:24:46
OUT MANCH-REC NBR 78 AT 08JUL2015 08:24:46 MSG 027016/08JUL2015 08:24:46

Received Time: 08:24:46 07-08-15 Source ORI: NH0063404
Summary: QH: NAM=PETRELLO, THERESA SEX=F
View Message Details

Message Accepted - MRI 27015 MANCH-REC 30 at 07/08/2015 08:24:46 Routed To:
IQ

SUMMONS**STATE OF NEW HAMPSHIRE
CITY OF MANCHESTER
MANCHESTER DISTRICT COURT**CASE # 15-9247TO: Yheresa Petrella D.O.B. [REDACTED]

<u>F</u>	<u>W</u>	<u>5'1"</u>	<u>160</u>	<u>BLU</u>	<u>BLN</u>
SEX	RACE	HEIGHT	WEIGHT	COLOR EYES	COLOR HAIR

OF (NO. P.O. BOX OR RFD#) 714 Belmont St, Manchester NH

YOU ARE HEREBY NOTIFIED TO APPEAR BEFORE THE MANCHESTER NEW HAMPSHIRE DISTRICT COURT
35 AMHERST STREET, MANCHESTER NEW HAMPSHIRE TO BE HELD

ON 7/9/15

AT 0815 AM IN THE FORENOON TO ANSWER A COMPLAINT CHARGING YOU

WITH Disorderly Conduct R/A 644.2 (V)

IN VIOLATION OF THE LAWS OF THE STATE OF NEW HAMPSHIRE AND OR CITY ORDINANCES

DO NOT FAIL TO APPEAR, OR YOU WILL ANSWER YOUR DEFAULT UNDER THE PENALTY PRESCRIBED BY
LAW. UPON FAILURE TO APPEAR, A WARRANT MAY BE ISSUED FOR YOUR ARREST. WILLFUL FAILURE TO
APPEAR IN ANSWER TO SUCH SUMMONS MAY BE PUNISHED AS PRESCRIBED BY LAW.

ISSUED 6/3/15BY Brandt #31SERVED IN HAND THIS DATE 6/3/15 AT 1615 TIME

Brandt #31 
POLICE OFFICER

MPDFORM94

WHITE-master file

YELLOW-court file

PINK-defendant

Incident/Investigation Report

Agency: MPD

Case Number: 15-009247

Date: 06/09/2015 15:04:01

Incident Information

Date/Time Reported 06/03/2015 16:08	Date/Time Found 06/03/2015 16:05	Date/Time Found 06/03/2015 16:08	Officer (100321) BRANDRETH, RYAN J
Incident Location Bridge St / Maple St, Manchester, NH 03104			

Charges

1	Charge Type State	Description DISORDERLY CONDUCT (V)	Statute 644:2 (V)	UCR 90C	☐ Att ☒ Com
Alcohol, Drugs or Computers Used ☐ Alcohol ☐ Drugs ☐ Computers		Location Type HIGHWAY/ROAD/ALLEY	Premises Entered	Forced Entry ☐ Yes ☒ No	Weapons 1. 2. 3.
Entry		Exit	Criminal Activity		
Bias Motivation		Bias Target	Bias Circumstances		Hate Group

Victims

Seq. # 1	Type GOVERNMENT	Injuries None	Residency Status Unknown		Ethnicity Unknown	
Name (Last, First, M) STATE OF NEW HAMPSHIRE			Race U	Sex U	DOB	Age
Address 405 VALLEY ST, MANCHESTER, NH 03103					Home Phone (603) 668-8711	
Employer Name/Address					Business Phone	
Victim of Crimes 1						

Incident/Investigation Report

Agency: MPD

Case Number: 15-009247

Date: 06/09/2015 15:04:01

Offenders

Seq. # 1	Type INDIVIDUAL	Name(Last, First, M) PETRELLO, THERESA M					
AKA		Race W	Sex F	DOB [REDACTED]	Age 53	Height 5'01" - 5'01"	Weight 158 - 158
Address [REDACTED] MANCHESTER, NH 03104						Home Phone (603) [REDACTED]	
Employer Name/Address						Business Phone	
Scars, Marks, Tattoos or other distinguishing features Scars/Scars Scars-Abdomen, Scar							
Physical Characteristics							

Suspect Details**Assisting Officers**

(100413) K9-COLT, OFC BIRON

(100457) MCKENNEDY, SHAUN M

Notes/Narrative

(100321) BRANDRETH, RYAN J

MO: Female panhandler issued summons for DOC after vehicles stopped in traffic.

RSA 644:2 Disorderly Conduct (V)

On 6/3/15 at approx 1600hrs I (Ofc Brandreth) was at a business check at the Seven Eleven located at 557 Maple St when my attention was drawn to a panhandler. The panhandler was holding a large cardboard sign at chest level that said "Veteran" and had smaller writing underneath it. She was standing on the grass between the sidewalk and the roadway on the west side of Maple St approx 15 feet south of Bridge St. Maple St is a 2 lane one way street at that point heading north. The panhandler was standing with her back to the traffic control device while facing northbound traffic.

While watching her I saw approx 7 vehicles hand her items. During a green light cycle for vehicles traveling north on Maple St a black Cadillac came to a complete stop and handed her something. The vehicle then traveled north through the intersection. The vehicle behind it, NH [REDACTED] a 2011 Jeep Grand Cherokee color gray, had to stop because the

Report: r_lw1ni.frx

Page 2 of 3

06/09/2015 15:04:01

PET013

Incident/Investigation Report

Agency: MPD

Case Number: 15-009247

Date: 06/09/2015 15:04:01

Cadillac stopped. The light turned red and the Cherokee was unable to make it through the intersection. If the Cadillac had not stopped, the Cherokee would have made it through on the green light cycle and would not have had to wait for the next light cycle.

I approached the female and she said that I needed to stop harassing her and she was calling the ACLU. She said that she was going to record me with her phone and told her there was no problem with that. I explained to her that she could not stop vehicles and she said that she did not stop anyone. I asked for her identification and she provided me a NH Drivers license. She was identified as

Theresa Petrello

Manchester

I returned to my cruiser and checked our in house contacts with THERESA. I located a summons she was issued on 5/15/15 from Sgt Laroche for Pedestrian in the Roadway, an offense I know is often related to panhandling.

I issued THERESA a white summons to appear in Manchester District Court, 9th Circuit on 7/9/15, for one count of Disorderly Conduct (Violation) RSA 644:2, for obstructing vehicular traffic.

NFI/RJB

COURT ACTION:

JUDGE

Date _____ Plea _____

Disposition _____

License Action _____

OFFICER'S NOTES FOR TESTIFYING IN COURT

Please note facts and circumstances in addition to those checked on face of complaint that is:

1. Any specific action of violator which increased the hazard of the violation;
2. Where violation observed and where contact made;
3. Total distance traveled during pursuit;
4. Statements by violator and general attitude;
5. Place of employment;

Sigh read "Veteran,
Any help appreciated"

Patrol in area of Hunner/Maple. Observed female standing on sidewalk south of intersection holding cardboard sign. Observed female walk into roadway and take item (BB) from vehicle (red). Went around block and fueled NB on Maple to speak w/ female. Stopped and began to explain that she could not solicit from motorists. Female immediately stated that there was no law against it and she would continue. Stated, "unless I step into the road, there's nothing you can do." Attempted to explain that her actions may cause an accident.

While conducting license/warrant/contact ✓ of female, she continued to solicit, asking drivers to pull closer to her b/c "cops are harassing a veteran". She then claimed I was violating her rights and she was going to sue me for harassment, that she had never stepped in the road and I was lying. I explained the summons and instructed her not to solicit traffic.

Witnesses: Officer Cataldo

PET015

Calls For Service Report				Call ID: 15064276		Printed: June 4, 2015	
1. Agency MPD		2. Person Received Complaint Mulvey, John		3. Date/Time Received 06/03/2015 0 16:08 4. Time Dispatched 16:08		5. Time Arrived 16:08 6. Time Complete 16:19	
7. Case # 15-009247							
8. Nature Of Incident		CHECK SUBJECT					
9. Location Of Incident		BRIDGE ST / MAPLE ST, MANCHESTER, NH 03104					
10. Victim or Caller							
11. Classification		12. How Received 'OFFICER' I/CAD...		13. Disposition CLDS		14. Officer Brandreth, Ryan J	
						15. Date Submitted 06/03/2015	

Notes: Field Event ** LOI search completed at 06/03/15 16:08:44 ** VEH search completed at 06/03/15 16:08:44 ** Case number C15009247 has been assigned ** >>>> by: STEPHANIE M. OUELLETTE on terminal: mpddisp1

Calls For Service Report				Call ID: 15056525		Printed: June 4, 2015	
1. Agency MPD		2. Person Received Complaint Coutu, Cassandra		3. Date/Time Received 05/15/2015 0 16:58 4. Time Dispatched 16:58		5. Time Arrived 16:58 6. Time Complete 17:18	
7. Case # -							
8. Nature Of Incident		CHECK SUBJECT					
9. Location Of Incident		HANOVER ST / MAPLE ST, MANCHESTER, NH 03104					
10. Victim or Caller							
11. Classification		12. How Received 'OFFICER' I/CAD...		13. Disposition SUMMONS ISSUED		14. Officer Larochelle, Matthew J	
						15. Date Submitted 05/15/2015	

Notes: ** LOI search completed at 05/15/15 16:58:12 Field Event ** PER search completed at 05/15/15 16:59:52