

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

SCOTT TALMADJE LEWIS,	:	CASE NO. 3:03CV196 (CSH)
	:	
Petitioner	:	
	:	
v.	:	
	:	
COMMISSIONER OF CORRECTION,	:	
	:	
Respondent.	:	
	:	

**PETITIONER’S FOURTH INTERROGATORIES
TO THE NEW HAVEN POLICE DEPARTMENT**

Pursuant to Rule 6(b) of the Rules Governing Section 2254 Cases, Petitioner requests that Respondent answer the following interrogatories, under oath, within ten (10) days.

If you cannot fully answer the following interrogatories, after exercising due diligence to obtain the information to do so, please state so and answer to the extent possible, specifying your inability to answer the remainder, and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing, so as to require supplemental responses as new and/or different information is required.

1. Was Frank Graham (see Death Certificate attached as Ex. 3) one of the confidential informants mentioned in Officer Trocchio’s Case/Incident Report for Complaint Number 59467, dated 06-07-1990 (attached as Ex. 4)?

ANSWER:

2. If Frank Graham was one of the several confidential informants mentioned in Officer Trocchio's Case/Incident Report (attached as Ex. 4), use the language of that report (i.e., "CI #1," "CI # 2," "Known and Reliable Sources/Confidential Informants," "a Known and Reliable Informant That Has Been Used by This Officer in Over Sixty (60) Narcotic Related Investigations," etc.) to specifically identify which of these informants was Frank Graham.

ANSWER:

3. Was one of the confidential informants mentioned in Officer Trocchio's Case/Incident Report for Complaint Number 59467, dated 06-07-1990 (attached as Ex. 4) the same confidential informant mentioned in Detective Maher's Case/Incident Report for Complaint Number 111567, dated 12-04-1990 (attached as Ex. 5)?

ANSWER:

4. If one of confidential informants identified in Officer Trocchio's Case/Incident Report (attached as Ex. 4) was also the confidential informant identified in Detective Maher's Case/Incident Report (attached as Ex. 5), specifically identify that informant using the language of Officer Trocchio's report (i.e., "CI #1," "CI # 2," "Known and Reliable Sources/Confidential Informants," "a Known and Reliable Informant That Has Been Used by This Officer in Over Sixty (60) Narcotic Related Investigations," etc.).

ANSWER:

Respectfully submitted,

By ____/s/_____ Date: May 2, 2013

Brett Dignam

Attorney for Petitioner Scott T. Lewis

CT 00283

Morningside Heights Legal Services, Inc.

435 West 116th Street - Room 831

New York, NY 10027

212-854-4291

Fax: 212-854-3554

Email: bdigna@law.columbia.edu