

VIRGINIA:

IN THE CIRCUIT COURT
FOR PRINCE WILLIAM COUNTY

COMMONWEALTH OF VIRGINIA

V.

JORDAN DAVID BAIRD

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Case #: CR16003807-00,
CR16003808-00,
CR16003960-00 thru
CR16003964-00

TO THE HONORABLE DAVID BECK, JUDGE OF SAID COURT:

The Commonwealth of Virginia, in response to Defendant's Motion for Discovery, states as follows:

ANSWER TO MOTION FOR DISCOVERY

The Commonwealth moves for reciprocal discovery under Rule 3A:11.

The Commonwealth incorporates what has been previously disclosed to defense counsel and what was disclosed during the preliminary hearing.

Accompanying this Answer is a DVD containing video of a statement made by David Baird.

Accompanying this Answer is a DVD containing several hundred search warrant photographs.

Accompanying this Answer is a DVD containing three files containing the defendant's statements to police.

Accompanying this Answer is a DVD entitled "Jordan Baird: The Next."

Accompanying this Answer are 22 pages of photographs and 1 page containing a social media posting.

Accompanying this Answer are 31 pages of text message communications.

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PRINCE WILLIAM COUNTY, VA
BY _____ DEPUTY

Accompanying this Answer are 33 pages of e-mails from the defendant to M.H.

Accompanying this Answer are 7 pages of State Corporation Commission documents.

Accompanying this Answer are 3 pages of color photographs.

Accompanying this Answer are 4 pages of color photographs.

Accompanying this Answer are 2 pages from jordanbaird.com.

Accompanying this Answer are 2 e-mails sent from the defendant.

Accompanying this Answer is a 1-page document containing photographs of Josh Baird and Jordan Baird.

Accompanying this Answer are two "modeling photos" of the defendant.

Accompanying this Answer is a 1-page "The Life Church DC" statement on legal-sized paper.

Accompanying this Answer is a 19-page document entitled "The Life Church DC Constitution and By-laws" seized pursuant to a search warrant.

Accompanying this Answer is a 17-page document entitled "The Life Church DC Constitution and By-Laws" seized pursuant to a search warrant.

Accompanying this Answer is a 2-page document entitled "Response Assistance" seized pursuant to a search warrant.

Accompanying this Answer is a 4-page packet seized pursuant to a search warrant (handwritten notes by David Baird, two pages of e-mails from Jeff Lehman, and a card with photographs).

Accompanying this Answer is a 7-page double-sided packet seized pursuant to a search warrant (the first page contains a Gmail printout with a subject line of "Executive Team Meeting: 2/9/15 agenda").

Accompanying this Answer is a 5-page packet seized pursuant to a search warrant (the first page is entitled "Job Description.").

Accompanying this Answer is a 1-page document entitled Life Church Outreach Lane 4 seized pursuant to a search warrant.

Accompanying this Answer is an 8-page document entitled Life Church Senior Leadership seized pursuant to a search warrant.

Accompanying this Answer is a 2-page document entitled Lane Leaders Meeting July 27, 2010 seized pursuant to a search warrant.

Accompanying this Answer is a 6-page document entitled Staff Pastors seized pursuant to a search warrant.

Accompanying this Answer is a 7-page document entitled Life Church Senior Leadership seized pursuant to a search warrant.

Accompanying this Answer is a 6-page document entitled Lane Leaders Planning Meeting seized pursuant to a search warrant.

Accompanying this Answer is a 23-page packet (first page entitled Worship and Production Team SESSIONS).

Accompanying this Answer is a 19-page packet seized pursuant to a search warrant (first page states Green File Folder) and containing financial information.

Accompanying this Answer is an 11-page packet seized pursuant to a search warrant (first page states Green File Folder) and containing insurance information.

Accompanying this Answer are 4 pages seized pursuant to a search warrant (first page is a list of employees and salaries).

The Commonwealth anticipates paying an expert \$850 and expenses.

The following is available for inspection at the Office of the Commonwealth's Attorney
for the City of Fredericksburg:

A 2-page document entitled "Time it Began Time it Ended."

An 8-page narrative of events written by M.H.

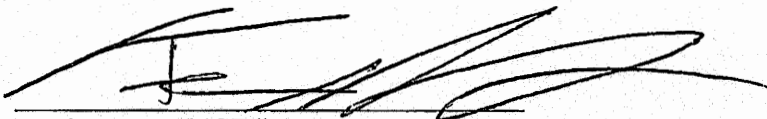
A DVD containing a police interview with M.H.

A 1-page document entitled "Narrative Information."

Three pages from a Virginia DSS report.

COMMONWEALTH OF VIRGINIA

By Counsel



Kevin Gross (VSB# 72990)

Special Prosecutor

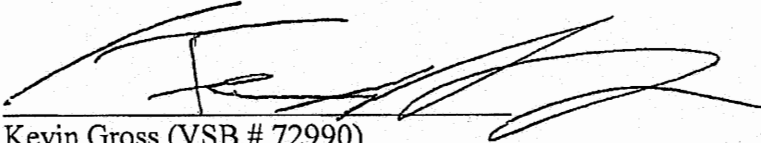
Assistant Commonwealth's Attorney: City of Fredericksburg

P.O. Box 886

Fredericksburg, Virginia 22404-0886

CERTIFICATE

I, Kevin Gross, Special Prosecutor and Assistant Commonwealth's Attorney for the City of Fredericksburg, do hereby certify that, on March 10, 2017, a true and correct copy of the foregoing Answer to Motion for Discovery was mailed to the law firm of SIMMS SHOWERS LLP, counsel for Defendant.



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