

STATE OF MARYLAND

v.

HELEN L. HOLTON

Defendant

IN THE CIRCUIT COURT

OF MARYLAND

FOR

BALTIMORE CITY

Case No.: 109209024

RECEIVED

SEP 14 2009

Criminal Div.
Circuit Court For
Baltimore City

* * * * *

DEMAND FOR A BILL OF PARTICULARS

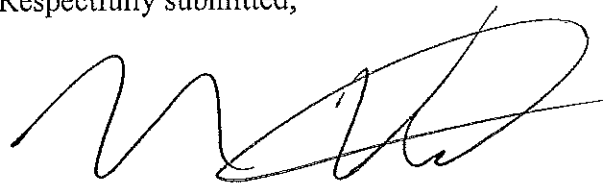
Helen L. Holton, Defendant, by her attorneys, Joshua R. Treem, Nicholas J. Vitek, Richard C.B. Woods and Schulman, Treem, Kaminkow & Gilden, P.A., pursuant to Maryland Rule 4-241, demands that the State provide responses to this bill of particulars.

The Defendant is charged in a two count indictment alleging a violation of conspiracy to violate campaign finance laws and for conducting campaign finance activity outside of a campaign finance entity. This information is not reflected in any discovery provided to date and the particulars seek specific information that is necessary to prepare a defense and to avoid surprise at trial and to determine if either of these charges violates the statute of limitations:

1. Specify the exact date in Paragraph 6 and Paragraph 20 that Helen L. Holton allegedly "request[ed] that an expenditure for the campaign be made directly to a third party without having the money pass through the hands of the treasure of the Citizens for Helen Holton."
2. Specify in what manner or specify what words were used to "request" an expenditure be made outside of a campaign finance entity as alleged in Paragraph 20.
3. Specify the exact date in Paragraph 7 in which Ronald H. Lipscomb and John Paterakis agreed to pay for the survey.

4. In Paragraph 7, the State alleges that Ronald Lipscomb and John Paterakis agreed to pay for the survey, but discovery provided reflects that they requested that the “cheapest” survey be commissioned. Specify the exact date on which State alleges that the total cost of the survey was known to Ronald Lipscomb and John Paterakis.
5. Specify the exact date in Paragraph 9 that Helen Holton “told” Ronald Lester to contact Ronald Lipscomb to obtain payment for the survey.
6. Specify in what manner, or specify what words were used by Helen Holton when she “told” Ronald Lester to contact Ronald Lipscomb as in Paragraph 9.

Respectfully submitted,

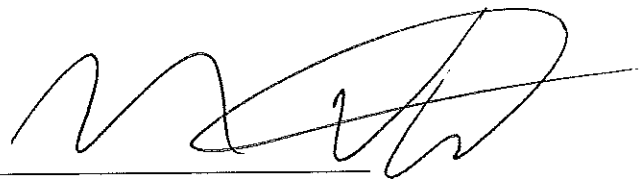


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of September, 2009, a copy of the foregoing *Demand for a Bill of Particulars* was sent via first class mail, postage paid to:

Robert Rohrbaugh, State Prosecutor
Thomas M. McDonough, Deputy State Prosecutor
Hampton Plaza, Suite 410,
300 East Joppa Road,
Towson, Maryland 21286-3152



Nicholas J. Vitek