

Your Name  
Address  
City State Zip  
Your Phone

To: Municipal Prosecutor, Court Address  
CC: Court Administrator, Municipal Court

**VIA CERTIFIED MAIL**

**Re: State v. Name**

Case Number: \_\_\_\_\_

Charge: \_\_\_\_\_

Arrest Date: \_\_\_\_\_

Arresting Officer: \_\_\_\_\_

**REQUEST FOR COMPLETE DISCOVERY AND OBJECTION TO  
ENTRY OF LABORATORY CERTIFICATE AS EVIDENCE AT  
TRIAL**

Dear Prosecutor: \_\_\_\_\_

As stated in original *Discovery Request*, and within 10 days of receiving discovery as per state case law: - Pursuant to N.J.S.A. 2C: 35-19, the defendant does hereby object to the entry of proffered laboratory certificate as evidence at the time of trial in this matter, pursuant to State v. Berezansky 386 NJ Super. 84 (App. Div. 2006), State v. Kent 391 NJ Super. 352 (App. Div. 2007) State v. Renshaw 390 NJ Super. 456 (App. Div. 2007), State v. Simbara 175 NJ 37 (2002) and State of New Jersey in the Interest of C.D. and P.G. 354 NJ Super. 457 (App. Div. 2002). The certificate is illegible, and has not been certified in accordance with N.J.S.A. 2C: 35-19 (b). The certificate fails to establish the type of analysis performed, the subscriber's full training and experience, the nature and condition of the equipment used, or the full conclusions reached by the subscriber. Defendant also objects to it on the grounds that Defendant intends to contest at trial the composition, quality, and quantity of substances submitted to the laboratory for analysis.

PLEASE TAKE FURTHER NOTICE that at the time of trial, the defendant shall contest the chain of custody with respect to the sample, and subsequent tests performed thereon. *Please have entire chain of custody available for testimony.*

ADDITIONALLY DEFENDANT REQUESTS:

"Records of any and all internal affairs and/or disciplinary complaints, their investigations and subsequent outcomes as well as records for any convictions of any offense (including but not limited to municipal ordinance violations, disorderly persons offenses and/or crimes) involving the arresting officer, all responding officers, witnesses and any officer or other person(s) handling and/or transporting evidence. Any records involving alleged bias on the basis of race, creed, color, national origin, nationality, ancestry, marital status, domestic partnership or civil union status, sex, affectional or sexual orientation, gender identity or expression, or disability the arresting officer, all responding officers, witnesses and any officer or other person(s) handling and/or transporting evidence.

**RESPECTFULLY SUBMITTED,**

Your Name