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ORIGINAL
FILED

Attorneys for Defendants

NOV 6 1987

GARY L. GRANVILLE, County Clerk
By AW DEPUTY

IN THE SUPERIOR COURT

ORANGE COUNTY JUDICIAL DISTRICT

PEOPLE OF THE STATE OF CALIFORNIA)

CASE NO. C 52776

Plaintiff,)

DECLARATIONS OF DETECTIVE
ST. JOHN AND DEPUTY CITY
ATTORNEY DONNA WEISZ JONES
WITH SUBPOENA DUCES TECUM
ISSUED SEPTEMBER 24, 1987

vs.)

RANDY STEVEN KRAFT,)

Defendant,)

LOS ANGELES POLICE DEPARTMENT
OF THE CITY OF LOS ANGELES,)

Real Party In Interest.)

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1 in no particular sequence or order.

2 4. To be certain that no other material relating to the
3 Freeway Murders was in the homicide division office other than in
4 the remaining two boxes, I checked over 120 three ring binder note
5 books and approximately 6 dozen manila folders covering unsolved
6 homicides and solved but uncharged homicides. I found no other
7 material. The two boxes that are now being tendered pursuant to
8 the 1987 SDT contain the only material that homicide division has
9 that was collected from the numerous freeway murder investigations.

10 5. A chronological summary is a record prepared by the
11 investigation so that events can later be incorporated into a
12 progress report or criminal investigation. The purpose of the
13 summary is to document the steps taken in the investigation in the
14 event another detective must assume responsibility for
15 investigation or for use in preparing a criminal case. This
16 summary is completed in the ordinary course of business and unless
17 specific reports identified by a "DR" number, the entry in the
18 summary is the only documentation prepared. The chronological
19 summaries that have been tendered are the complete summaries
20 concerning the freeway investigations and include any information
21 or activities by partner officers. The chronological summary stops
22 in May of 1977 because at that time I returned to Homicide from the
23 Freeway Murder task force. After that date, I began to work on the
24 Bonin case.

25 6. The SDT requested reports etc. concerning latent
26 prints. If I ever received any such items, they would be among the
27 40,000 pages previously tendered or in the remaining boxes being
28 tendered. Among the items being tendered are Department of Motor

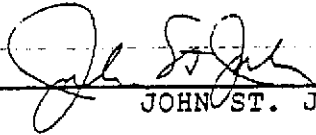
1 Vehicle records of license plates observed at certain locations.
2 Because of the right of privacy of the individuals whose license
3 numbers were checked, these items as well as all other items
4 contained in the two boxes that are being tendered herewith are
5 being tendered with the understanding that they are covered under
6 the protective order issued by the Honorable James K. Turner on
7 December 30, 1986.

8 7. The LAPD is not the custodian of records for any items
9 or reports prepared by any other law enforcement agency.

10 8. The two boxes being tendered contain the exact
11 material that defense counsels' law clerk looked at last week at
12 Parker Center.

13
14 I declare under penalty of perjury under laws of the State
15 of California that the foregoing is true and correct.

16 Executed this 5th day of November, 1987, at Los Angeles,
17 California.

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20 _____
21 JOHN ST. JOHN
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