

IN THE SUPERIOR COURT OF KINGS COUNTY
STATE OF GEORGIA

STATE OF GEORGIA

vs.

GRETCHEN STEVANS,

Defendant

MOTION TO REVEAL ALL DEALS MADE WITH STATE'S WITNESSES

Defendant, GRETCHEN STEVANS, through counsel, moves this court to require the State to reveal to the defendant all deals made with any State's witness in this case. In support of this motion, Defendant states as follows:

1.

Evidence of agreements made between the State and a material witness in which the State offers immunity or leniency to the witness must be disclosed to the defendant. *Giglio v. United States*, 405 US. 150, 92 S.Ct 763, 31 L.Ed.2d (1972); *Dinning v. State*, 266 Ga. 694, 470 S. E. 2d 431 (1996).

2.

The State has informed defense counsel that at least one felony case is pending against material witness, Mary Liar Badgirl. Additionally, other criminal cases may be pending against other witnesses for the State.

3.

The defense hereby requests, pursuant to law cited above, that this court order the State to provide every detail of every deal, whether made in writing or not, whether in this county or not, and whether express or implied, with every witness that the State has identified in this case.

Respectfully Submitted,

Attorney for Defendant

Bar no.

Address