

IN THE CIRCUIT COURT OF LONOKE COUNTY, ARKANSAS

STATE OF ARKANSAS

PLAINTIFF

VS.

NO. CR-97 9

HEATH STOCKS

DEFENDANT

MOTION FOR DISCLOSURE TO DEFENDANT

Comes now HEATH STOCKS GATES by his attorney, Edgar R. Thompson, and moves the Court for an order directing the Prosecuting Attorney of Lonoke County, Arkansas, to serve upon the defendant's attorney a Bill of Disclosure, in accordance with Rule 17, Arkansas Rules of Criminal Procedure, setting forth but not limited to the following items:

1. The exact times, dates and places including street addresses and locations wherein the alleged acts set forth in the information filed herein against the defendant occurred.
2. The precise manner in which the crime charged in the information is alleged to have been committed.
3. The names, addresses, phone numbers and occupations of persons whom the Prosecuting Attorney intends to call as witnesses at any hearing or at trial and the substance of each said witnesses anticipated testimony. Also supply copies of or dates of any and all disciplinary action taken or filed against any officer whether uniformed officer or undercover officer; and state if a suspension or fine resulted from the action.
4. Any written or recorded statements and the substance of any oral statements made by the defendant, a co-defendant or any other witness.
5. Copies of all search warrants and affidavits for search warrants issued in

this case.

6. Copies of all waivers of rights allegedly executed by the defendant or any defendant in this cause.

7. Any reports or statements of experts made in connection with the particular case, the results of any scientific examinations or tests which were conducted in connection with this particular case including, but not limited to medical, blood, breath, botanical, chemical, ballistics, handwriting or polygraph tests, examinations or analysis, the results of physical or mental examinations and experiments or comparisons.

8. Any books, papers, documents, photographs, writings or tangible objects which the Prosecuting Attorney intends to use in any hearing or at trial, or which were obtained from or belonged to the defendant or any other proposed witness or person interviewed by the Prosecuting Attorney, police officer of prosecuting witness.

9. Any record of prior criminal convictions of the defendant or any other persons whom the Prosecuting Attorney intends to call as a witness at any hearing or trial.

10. The relationship by business, leisure, blood or marriage to the prosecuting authority or persons whom the Prosecuting Attorney intends to call as witnesses at any hearing or trial.

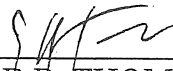
11. Whether or not there has been any electronic surveillance of the premises of the defendant or of any conversations to which the defendant was a party.

12. Any material information within the Prosecuting Attorney's knowledge,

possession or control which tends to negate or affirm the guilt of the defendant as to the offense charged and would tend to increase or reduce the punishment therefor.

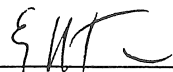
13. Copies of any and all statements given to any law enforcement person, the Prosecuting Attorney or any other person, whether made by the defendant, witnesses or victims.

14. The foregoing motion is a continuing motion and shall be prospective and well as for current material.

  
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EDGAR R. THOMPSON, Ark. Bar No. 58017  
ATTORNEY FOR THE DEFENDANT  
P.O. BOX 734  
CABOT, ARKANSAS 72023  
501-843-6791

CERTIFICATE OF SERVICE

I, Edgar R. Thompson, do hereby certify that I have delivered a copy of the above and foregoing Motion for Disclosure to the Defendant to Mr. Larry Cook, Prosecuting Attorney by delivering a copy to his office in Cabot, Arkansas on January 21, 1997.

  
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Edgar R. Thompson