

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA,	)	
	)	Warrant Nos. _____
v.	)	
	)	Murder; Criminal Attempt to Commit False
WILLIAM RODERICK BRYAN,	)	Imprisonment
Defendant.	)	

**FIRST PARTICULARIZED MOTION FOR DISCLOSURE OF BRADY MATERIAL, AND FOR OTHER RELIEF, AND MEMORANDUM IN SUPPORT THEREOF.**

COMES NOW Defendant William Roderick "Roddie" Bryan, by and through undersigned counsel, pursuant to the Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments to the United States Constitution, Article I, Section I, Paragraphs 1,2,11,12,14,16, and 17 of the Constitution of the State of Georgia; Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194, 10 L.E.2d 215 (1963); Williams v. State, 250 Ga. 463, 298 S.E.2d 492 (1983), and this court's inherent power to compel discovery, see Hightower v. State, 259 Ga. 770, 386 S.E.2d 509 (1989), and files this his First Particularized Motion for Discovery of Brady Material, and For Other Relief, and Memorandum of Law In Support Thereof Defendant shows as follows:

1. William Roderick "Roddie" Bryan, or undersigned counsel, is incarcerated without bond at the Glynn County Detention Center.
2. Bryan has demanded a speedy trial.
3. Defendant seeks immediate disclosure of any documents, information, facts or other circumstances (including any of such that are intangible but digitally stored) that are exculpatory or might reasonably lead to the discovery of the following exculpatory information:

- A. Any reason to believe that the Cobb County District Attorney Foyette Holmes, or the Cobb County District Attorney's office (including any member thereof) harbors any bias or prejudice against Mr. Bryan or undersigned counsel.

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B. Any formal or informal agreements, arrangements, deals, or understandings of any kind, whether made directly or indirectly, and whether for cash, in-kind campaign contributions, endorsements or withholding of endorsements, or other consideration, between former Cobb County District Attorney and current GBI Director Vic Reynolds, Cobb County District Attorney Joyette Holmes (or others acting on their behalf (with or without their advance knowledge)) with the Democratic Party of Georgia, Cobb County Democratic Committee or the Democratic Party nominee for Cobb County District Attorney, Flynn Broady, whether specifically with respect to the arrest of William Roddie Bryan or other specific individuals in connection with the tragic shooting death of Ahmaud Arbery or more generally, e.g., formal or informal assurances that the State of Georgia would “zealously” prosecute subjects of the investigation.

4. Defendant notes, in support of this motion, that although neither Joyette Holmes nor Flynn Broady have filed campaign contribution disclosures for April 30, 2020, from the January 31, 2020 disclosures, it would appear that neither campaign had sufficient funds on hand for a contested 2020 race for District Attorney and that both candidates therefore, as of February 23, 2020, had underfunded political campaigns that left each candidate especially vulnerable to the influence of outside special interests.

5. Defendant further notes that Democratic Party candidate Flynn Broady – who depending on the November election results could take over the prosecution of Roddie Bryan in January 2020 (if Mr. Bryan is denied the speedy trial that he has requested) – posted on his campaign’s facebook page about the Arbery shooting contemporaneously with the appointment of Joyette Holmes as special prosecutor, along with a picture captioned “Meth, Murder and


Madness: The System that Buried Ahmaud Arbery.” Mr. Flynn’s regrettable decision to inject the Arbery shooting into his campaign for District Attorney has understandably raised questions as to whether investigative and prosecutorial decisions in this case have been or will be politically motivated.

6. Defendant further notes that candidate Flynn Broady has been making and sharing as many posts from the Democratic Party of Georgia, Cobb County Democratic Party, and presumptive Vice Presidential Nominee Stacy Abrams, then he has about his own campaign for District Attorney – an odd campaign strategy in a supposedly contested election in a county in which Hillary Clinton did very well in 2016.

7. Undersigned counsel has filed this motion as part of his due diligence in assuring that Mr. Bryan generally receives the due process to which he is entitled and specifically that he receives a fair trial prosecuted by a neutral, detached and impartial prosecutor.

WHEREFORE, Defendant prays that the State be compelled to disclose the information requested above immediately, and in any event prior to bail and preliminary hearings, motions hearings, and trial.

So moved, this 1st day of June, 2020.

  
Kevin Gough  
ATTORNEY FOR DEFENDANT  
Georgia Bar No. 303210

Kevin Gough Firm, LLC  
501 Gloucester Street, Suite 121  
Post Office Box 898  
Brunswick, GA 31521  
(912) 242-5114  
[kevingough.firm@gmail.com](mailto:kevingough.firm@gmail.com)

CERTIFICATE OF SERVICE

COMES NOW Kevin Gough, attorney for the defendant, and hereby certifies that a copy of the foregoing document(s) have been served upon the District Attorney by email delivery this date.

This 1<sup>st</sup> day of June, 2020.

  
s/ Kevin Gough

Kevin Gough Firm, LLC  
501 Gloucester Street, Suite 121  
Post Office Box 898  
Brunswick, GA 31521  
(912) 242-5114  
[kevingough.firm@gmail.com](mailto:kevingough.firm@gmail.com)