

*Randall M Adams*  
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA,	)	
	)	
	)	
v.	)	Criminal Action No. 20-CR-00433
	)	
WILLIAM RODERICK BRYAN,	)	
Defendant.	)	

**MOTION FOR DISCLOSURE OF IMPEACHING INFORMATION**

COMES NOW Defendant William Roderick "Roddy" 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), this court's inherent power to compel discovery, see Hightower v. State, 259 Ga. 770, 386 S.E.2d 509 (1989), and other applicable law, and files this his "Motion for Disclosure of Impeaching Information," and respectfully moves this Court for entry of an order directing the State of Georgia to investigate and disclose all of the following within the possession, custody, control, or the existence of which is known or by the exercise of due diligence could become known to the prosecution, and on a continuing basis:

1. Any and all consideration or promises of consideration given to or made to all witnesses for the State. By "consideration" Defendant refers to absolutely anything of value or use, including but not limited to immunity grants, witness fees, special witness fees, reward money, transportation assistance, assistance to members of the witness' family or associates of the witness, assistance or favorable treatment with respect to any criminal, civil, or administrative dispute with the State or the United States, and anything else which could

arguably create an interest or bias in the witness in favor of the State or against the Defendant or acts as an inducement to testify or to color testimony;

2. Any and all prosecutions, investigations or possible prosecutions pending or which could be brought against a witness for the State and any probationary, parole or deferred prosecution status of a witness for the State;

3. Any and all records and information revealing felony convictions attributed to each witness for the State;

4. Any and all records and information showing prior misconduct or bad acts committed by a witness for the State, including juvenile records; and

5. Any and all personnel files for a witness for the State.

6. Whether any pending investigation or file exists involving the Department of Family and Children's Services, any Juvenile Court within the State of Georgia, Department of Community Supervision, Department of Natural Resources or Board of Education Police Department or any college campus police department of and any witness or member of their family.

7. Any evidence of mental disease, defect or illness.

8. Any history of substance of abuse.

9. Any prior inconsistent statement of the witness.

10. Any other matter which might tend to impeach or discredit the testimony of a witness.

WHEREFORE, Defendant prays that the court grant said motion and compel the prosecution to disclosure any and all information which might tend to impeach any of the State's witnesses.

So noted, this 16<sup>th</sup> day of July, 2020.

/s/ Kevin Gough  
Kevin Gough  
ATTORNEY FOR DEFENDANT  
Georgia Bar No. 303210

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**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 16<sup>th</sup> day of July, 2020.

/s/ Kevin Gough

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