

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 TO REVEAL THE DEAL

Comes now the 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), 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 moves the Court to require the State of Georgia to respond in writing as to any deals or considerations made between the prosecution witnesses and the State of Georgia, including any prosecutors office, Glynn County Board of Education Police Department (School Resource Officers), Glynn County Sheriff’s Office, Federal Bureau of Investigation, Georgia Bureau of Investigation, College of Coastal Georgia and Technical College Police Departments (Campus Police), Federal Drug Enforcement AGENCY (DEA), Immigrations and Customs Enforcement (ICE), Federal Department of Alcohol, Tobacco and Firearms (ATF), Naval Criminal Investigative Service (NCIS), Georgia State Patrol (GSP), C.O.D.E (or other multi-jurisdictional drug task force), any and all other law enforcement agencies involved in the investigation and prosecution of this case. Said motion includes but is not restricted to the following items:

1. Whether any witness has or may receive, or might reasonably anticipate receiving, or has been offered, in return for testifying in this case, any consideration of any nature whatsoever in any cases presently pending against the witness in the Federal, Juvenile, Magistrate, Military, Municipal, Probate, State, or Superior Courts within the Brunswick Judicial Circuit, Georgia, or in cases pending before any similar court in any other jurisdiction.

2. Whether any witness has ever been made or reasonably anticipates being made a trustee or allowed other special privileges at any government facility where the witness is incarcerated or otherwise works, studies or resides, in return for testimony in the above-styled case.

3. Whether any witness has been offered or granted use, derivative use, or transactional immunity or any other kind of immunity from prosecution for any offense, either by a prosecutor, court, law enforcement officer (regardless of whether said officer had authority to extend same), or other individual or entity representing that they had authority to offer same, whether extended formally or informally, whether extended directly to the witness or indirectly through counsel or others, or had charges dismissed, nol prossed, dead-docketed, reduced, consolidated, or otherwise disposed of, and whether any witness might reasonably have anticipated being prosecuted for any offense for which he had not been charged before agreeing to testify for the prosecution.

4. Whether any law enforcement agency (or individual acting under apparent authority of same) has offered or agreed not to take out warrants against any witness, or offered or agreed not to serve said warrants or delay service of same, or offered or agreed to make recommendations with respect to parole or probation eligibility or revocation, or offered or agreed to help Defendant obtain a bond or reduction in bond of any witness.

WHEREFORE, Defendant moves for the prosecution to respond in writing as to these matters and further moves the court to require the prosecution to reveal any other promises of leniency or consideration given to the prosecution witnesses.

So noted, this 16th 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 16th day of July, 2020.

/s/ Kevin Gough

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