

*Ronald M Adams*  
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY

STATE OF GEORGIA

STATE OF GEORGIA

\*

V.

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CASE # CR-2000433

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TRAVIS MCMICHAEL and  
GREG MCMICHAEL

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**OBJECTION TO EXHIBITS**

COMES NOW THE STATE OF GEORGIA and objects and moves this Court to prohibit Defendants in the above-styled case from introducing certain exhibits of evidence in this case and shows the following:

1.

Defendants are charged individually and as parties to the crime with Murder and related crimes involving the fatal shooting of victim Ahmaud Arbery, an unarmed man shot while jogging in Glynn County, Georgia on February 23, 2020.

2.

On Monday, November 9, 2020, counsel for Defendant Greg McMichael emailed the State notice and a listing of certain items of "rebuttal evidence" that might be tendered during specially set motions hearings on November 12, 2020. That evidence and those exhibits appear to include, among other things:

- Press releases regarding DOJ prosecutions for hate crimes out of the states of Indiana, Michigan, Mississippi, and California.

3.

The specially set November 12, 2020 evidentiary motions hearing is for Motions for Bond. The above listed items are wholly unrelated to this case and have no bearing or relevance to the issues pertaining to bond, namely, whether Defendants in the above-styled case: a) pose no

significant risk of flight, b) pose no significant danger to persons, community, or property, c) pose no significant risk of committing new felony, or d) pose no significant risk of intimidating witnesses or obstructing justice. See O.C.G.A. § 17-16-1.

4.

WHEREFORE, the State moves this Court to prohibit Defendant in the above-styled case from introducing evidence regarding bad character or alleged specific instances of misconduct of the victim.

This 10<sup>th</sup> day of November 2020.

Presented by:

*/s/ Jesse Evans*

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Jesse D. Evans  
Deputy Chief Assistant District Attorney  
Cobb Judicial Circuit  
State Bar No. 252342