

STATE OF SOUTH CAROLINA)
COUNTY OF HORRY)

IN THE COURT OF GENERAL SESSIONS
OF THE FIFTEENTH JUDICIAL CIRCUIT

STATE OF SOUTH CAROLINA)

CERTIFICATE OF REPRESENTATION
(APPOINTING AS COUNSEL)

-VS-

TRACY WILLIAMS

CATHERINE D. OWENS

DEFENDANT)

FILE NO: 26A13-00000512

SSN: 250-37-2377

TO: Court of General Sessions of the Fifteenth Judicial Circuit
Office of the Solicitor
Appointed Counsel
Defendant

This certifies that the above captioned Defendant is eligible for the services of the Public Defender, such determination having been made on, 15th day of February, 2013, regarding the charge(s) of:

- J-868332 Tax/ wilfully assisting in false or fraudulent tax return
- J-868333 Tax/ wilfully assisting in false or fraudulent tax return
- J-868334 Tax/ wilfully assisting in false or fraudulent tax return
- J-868335 Tax/ wilfully assisting in false or fraudulent tax return
- J-868336 Forgery / Forgery, value less than \$10,000
- J-868337 Forgery / Forgery, value less than \$10,000
- J-868338 Forgery / Forgery, value less than \$10,000
- J-868339 Forgery / Forgery, value less than \$10,000
- J-868340 Conspiracy / Criminal Conspiracy, Common Law conspiracy defined

CLERK OF COURT
HORRY COUNTY

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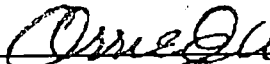
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- J-868341 Conspiracy / Criminal Conspiracy, Common Law conspiracy defined
- J-868342 Conspiracy / Criminal Conspiracy, Common Law conspiracy defined
- J-868343 Conspiracy / Criminal Conspiracy, Common Law conspiracy defined

The Defendant's Counsel is **Catherine D. Owens**. The office of the Public Defender requests on the Defendant's behalf any and all evidence in the possession of you and or your agents pursuant to S.C. Criminal Practice Rule 5, and Brady v. Maryland 373 U.S. 383 (1963). The formal Motion for Discovery is attached.

CONWAY, SC
 DATED: February 15, 2013


 ORRIE E. WEST
 FIFTEENTH CIRCUIT
 PUBLIC DEFENDER

CLERK OF COURT
 HARRY COUNTY

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STATE OF SOUTH CAROLINA)
COUNTY OF HORRY)

IN THE COURT OF GENERAL SESSION
OF THE FIFTEENTH JUDICIAL CIRCUIT

STATE OF SOUTH CAROLINA)

NOTICE AND MOTION FOR PRODUCTION

-VS-

OF SPECIFIC EVIDENCE AND
DISCLOSURE OF WITNESSES

TRACY WILLIAMS
DEFENDANT)

FILE NO: 26A13-00000512
SSN: 250-37-2377

TO: SOLICITOR FOR THE FIFTEENTH JUDICIAL CIRCUIT

CLERK OF COURT
HORRY COUNTY

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YOU WILL PLEASE TAKE NOTICE that unless the prosecution responds to the Defendant's request for disclosure within 30 days, or within such time as may be ordered by the Court, Counsel for the Defendant will move this Court for an Order compelling that the State:

1. Make available for Defendant any and all written and oral statements by the Defendant which are, or may come to be, in the possession of the State.
2. Make available for purposes of inspection, and copying, any and all police reports relating to the investigation and circumstances surrounding the crime which the Defendant is charged with, including any and all statements taken from witnesses and the Defendant.
3. Make available to the Defendant all tangible objects obtained during the investigation of this case, including, but not limited to:
 - (a) All tangible objects obtained from the scene of the crime; and
 - (b) All tangible objects obtained from the State's witnesses in this case
 - (c) All tangible objects the State intends to introduce into evidence at Trial which are relevant to the offense charged.
4. Make available any witnesses known to the State who have knowledge of facts which might be favorable to the Defendant.
5. Make available any promises made or actions taken by the State which caused or might have caused any witnesses for the State to testify on behalf of the State.
6. Make available any inconsistent statements made by witnesses for the State or any statements made by witnesses for the State which tend to exculpate the Defendants or to negate participation by the Defendants in the alleged crime.
7. Make available to the Defendant all results of laboratory tests, scientific tests, or physical examinations conducted in connection with this case, including but not limited to:
 - (a) Analysis of handwriting
 - (b) Photographs secured of the scene of the crime
 - (c) Comparison of fingerprints

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8. Make available any facts which tend to exculpate the Defendant.
9. Make available any and all scientific or medical, psychiatric, legal or other information, reports or records which might tend to reflect on the credibility or competence of any of prospective witnesses for the State.
10. Make available to the Defendant the names and addresses of all persons who have knowledge of this case or who have been interviewed by the investigating officers in connection with this case.
11. Make available to the Defendant, the SLED, FBI, and local arrest and conviction records of all persons, including the Defendant, named in connection with this proceeding.
12. Make any chemist, analyst, and all persons within the chain of custody appear in Court for the purpose of personally testifying. Attorney for the Defense thus objects to the introduction of any chemist's or analyst's report pursuant to Rule 6, S.C. Rules of Criminal Procedure.

This information is requested pursuant to Rule 5 of the South Carolina Rules of Criminal Procedure. This information is further requested pursuant to *Brady vs. Maryland*, 373 U.S. 383, 10 L. Ed. 2d 215, 83 S. Ct. 1194 (1963), *U.S. vs. Agurs*, 427 U.S. 97, 49 L. Ed 2nd 342, 96 S. Ct. 2392 1976, *State vs. Mixon* 274 S.E. 2nd 406 (1981). Further this information is requested on the grounds that it is essential to insure the Defendant's right to a fair trial, right to confrontation of witnesses, the right to effective Counsel and due process of law guaranteed by the South Carolina Constitution, and the United States Constitution.

WHEREFORE, Defendant prays:

- (a) That the Solicitor be Ordered to produce all information described herein and allow the Defendant the right to examine, inspect, copy and photograph, such materials and information at a specific time and place to be fixed by the Court.
- (b) That the information be provided no later than 30 days from the date of this request, as reflected by the Clerk of Court's time-stamp appearing on the face of this Document.
- (c) That the Court enter an Order requiring the Solicitor's Office to make continuing disclosure of all matters requested herein up to and during the Trial of the charges against the Defendant.

RESPECTFULLY SUBMITTED,



ORRIE E. WEST
FIFTEENTH CIRCUIT
PUBLIC DEFENDER

DATED: February 15, 2013
CONWAY, SOUTH CAROLINA

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 CLERK OF COURT
 HONORABLE COURT