

4-25-13
Goebel

FILED

APR 15 2013

DOROTHY BROWN
CLERK OF CIRCUIT COURT

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
CRIMINAL DIVISION**

State Of Illinois,)	
)	
Plaintiff,)	No. 08CR10502
)	
v.)	Judge Steven J. Goebel
)	
Annabel K. Melongo)	
)	
Defendant,)	
)	

Motion For Additional Bill Of Particulars

NOW comes ANNABEL MELONGO, Pro Se, and motions this Honorable Court under 725 ILCS 5/114-2 and 725 ILCS 5/114-9 to order the State's Attorney to produce additional information in response to the defendant's motion for a Bill Of Particulars for the following reasons:


1. The defendant is charged with three counts of Computer Tampering alleging unauthorized remote access of Save A Life Foundation computers and servers and removing and deleting files during the intrusion.
2. On January 11th, 2013, the defendant motioned the state prosecutor to issue details of the particular acts as alleged.
3. On January 25th, 2013, the state responded to said motion in two short paragraphs listing the date and time of the alleged incidents and failing to specify with particularity the following statements made to the Grand Jury on May 28th, 2008(p.8, lines 15-24) :
 - Q. *These experts that were hired by Save A Life, did your investigation reveal that they were able to trace the individual responsible for intruding on the system?*
 - A. Yes.
 - Q. *And this was done by tracing the actual intrusion by back stepping it?*
 - A. Yes. *They went into the server log which kept track of every single computer that accessed the server and using those logs and an IP*

address search we tracked it back to Ms. Melongo's computer.

4. The defendant is hereby asking the state prosecutor to provide the following information:
 - a. Names and addresses of the experts hired by Save A Life as alleged in the above exchange.
 - b. Name of the server intruded upon as alleged in the above exchange.
 - c. The details of the IP logs used and well the author(s) of said logs as alleged in the above exchange.

WHEREFORE, the defendant is asking this Honorable Court to request the State to provide additional information to the Defendant setting forth the missing information in all its specificity.

Respectfully Submitted,



Defendant's lawyer

Atty. No.: 99500

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