

FILED
JUDGE STEVEN J. GOEBEL-1954

JAN 11 2013

CLERK OF THE CIRCUIT COURT
CRIMINAL DIVISION

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 Bill Of Particulars and List Of Witnesses

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 a Bill Of Particulars and List Of Witnesses 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 in the process. The accusation fails to specify with particularity the following:
 - a. The particular acts as alleged.
 - b. The time and circumstances of the alleged acts.
 - c. The names of the experts hired by Save A Life Foundation to remedy the incident.

2. Bill of Particulars
 - a. The particular acts as alleged.
 - b. The time and circumstances of the alleged acts.
 - c. The names of the experts hired by Save A Life Foundation to remedy the incident.

3. List of Witnesses
 - a. A list of witnesses to the occurrence, or persons who have had knowledge of the incident, or whom the State intends to call as witnesses and their addresses, including production of the information requested by the defendant in her Discovery Motion filed on July 6th, 2010, in Paragraph 2, a-q.

4. The Defendant requires the above information to properly plead as well as prepare an adequate defense.
5. This Court has discretion to require the State to produce a Bill of Particulars and all information regarding witnesses as requested above.

WHEREFORE, the defendant is asking this Honorable Court to request the State to provide the Defendant with a Bill of Particulars setting forth the missing information as well as a list of witnesses as requested as soon as possible.

Respectfully Submitted,

Defendant's lawyer

Atty. No.: 99500

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