

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
CRIMINAL DIVISION

FILED  
JUDGE STEVEN J. GOEBEL 1951

AUG 20 2013

CLERK OF THE CIRCUIT COURT  
CRIMINAL DIVISION

State Of Illinois,

Plaintiff,

v.

Annabel K. Melongo

Defendant,

No. 08CR10502

Judge Steven J. Goebel

Final Motion Requesting Order To Produce Evidence

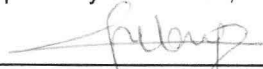
NOW comes ANNABEL K. MELONGO, Pro Se, and petitions this Court to order the state prosecutor to produce evidence proving Defendant's guilt in the above captioned case. As grounds of this request, Defendant's states:

1. The above captioned case commenced in October 31<sup>st</sup>, 2006, and was initially dismissed in Rolling Meadows, IL, on January 10<sup>th</sup>, 2007, for lack of evidence.
2. The state prosecutor refiled the charges on January 17<sup>th</sup>, 2007, at 2600 S. California in Chicago, IL, which charges were superseded on May 28<sup>th</sup>, 2008, by a new indictment.
3. On February 9<sup>th</sup>, 2010, the defendant issued a motion to compel discovery or to dismiss. Said motion was never argued because the defendant was arrested and sent to jail on new charges, 10CR0809201, the eavesdropping case.
4. On July 26<sup>th</sup>, Defendant's new lawyer, Mr. Nick Albukerk, also filed a motion for discovery requesting evidence proving Defendant's guilt. That motion was also never argued because the state prosecutor on that same day, switched election to the eavesdropping case.
5. Once the eavesdropping case was officially dismissed, on July 26<sup>th</sup>, 2012, and the above captioned case resumed, the defendant's has repeatedly requested, on almost all court hearings, for evidence backing the state prosecutor's allegations to the Grand Jury.
6. On May 14<sup>th</sup>, 2013, the defendant filed a motion to compel discovery per Illinois Supreme Court Rules 412 and 415(g)(i).
7. Though this Court had granted said motion and urged the state prosecutor to produce said evidence, the defendant has not received any document and consequently can't properly prepare for a trial that this Court had already scheduled for October, 2013.

WHEREFORE, the defendant is asking this Honorable Court to order the state prosecutor to produce evidence in the present case and to enforce its authority per Illinois Supreme Court Rule

415(g)(i). Failure by this Court to do so by the next court hearing will compel Defendant to stay proceedings in this Court and to petition the Illinois Supreme Court for a Writ of Mandamus.

Respectfully Submitted,

  
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Defendant's lawyer

Atty. No.: 99500

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