

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

State Of Illinois,)
)
 Plaintiff,)
)
 v.)
)
 Annabel K. Melongo)
 Defendant,)
)

No. 08CR10502
Judge Steven J. Goebel

FILED

FEB 14 2013

WENDY BROWN
CLERK OF CIRCUIT COURT

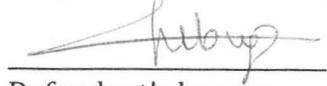
MOTION TO ADMONISH STATE AND CAROL SPIZZIRRI

Now comes Annabel K. Melongo, Pro Se, and respectfully asks this Honorable Court to admonish the state prosecutor and Carol Spizzirri for interfering with the defendant's strategy defense while issuing subpoenas Duces Tecum. As grounds of this motion the defendant states:

1. Carol Spizzirri is the complainant in the above captioned case.
2. At various occasions during Discovery, the state prosecutor went on record telling this Honorable Court that Carol Spizzirri was a third party to this case when the Defendant tried to have documents from her through the state.
3. It reality, Carol Spizzirri's role in this case is beyond that of a complainant or a third party. She's the leitmotiv in this case making decisions and directing people and the state prosecutor to prevent the Defendant from presenting a meaningful defense.
4. As such, she contacted various individuals and advised them not to respond to subpoenas ordered by this Honorable Court and directed them to the state prosecutor to have them quashed. Attached Exhibit 1.
5. Carol Spizzirri's actions are criminal under 720 ILCS 5/32-4(b) in that she's deterring various witnesses in the case at bar to comply with subpoenas issued by the Defendant.

WHEREFORE, due to the conflict of interests and the lack of fair trial that result from Mrs. Spizzirri and the state prosecutor's actions, the Defendant respectfully asks this Honorable Court to admonish both the state prosecutor and Carol Spizzirri and to order Carol Spizzirri to limit her actions to those of a complainant or a third party to this case.

Respectfully Submitted,



Defendant's lawyer

Atty. No.: 99500

Name: Annabel K. Melongo

Address: P.O. Box 4734

City/State/Zip: Chicago, IL 60680

Telephone: 708-422-2562

From: "Christian B. Sass" <sastian@gmail.com>
Subject: **Fwd: Melongo**
Date: February 23, 2010 3:04:50 PM CST
.To: "Brian J. Salerno" <Brian.Salerno@True-Consult.com>

Just wanted to let you know that i got a call from Julie today. thought i would consult with you before talking to anybody... I also got a linkedin message from carol...

LinkedIn

Carol Spizzirri has sent you a message.

Date: 2/23/2010

Subject: Long time Christian

I pray you and your family are well. It wasn't that I didn't want to connected sooner...I was directed to keep low key - but now State's Atty needs to know if you received a subpeona? If so, need to call State Atty Julie Gunnigle 773-869-2893 and fax it to her ASAP 773-869-6393 to expunge. Warmest regards Carol

Christian

Begin forwarded message:

From: "Julie Gunnigle" <jgunnigle@cookcountygov.com>
Date: February 23, 2010 11:47:33 AM CST
To: <sastian@gmail.com>
Subject: RE: Melongo

Dear Christian,

I appreciate you taking the time to talk with me today. For your reference, I can be reached at 773-869-2893. As this case gets closer to trial, I would appreciate some of your time to discuss what happened at Save A Life, your findings that morning, and whether we would need to call you as a witness should this case go to trial.

It is my understanding that you wish to consult with Mr. Salerno before we speak again. Would you please forward my information to him in the event that he has any questions?

Julie Gunnigle
Assistant State's Attorney

Exhibit 1