

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) No. 07-CR-30193-JPG
)
 TARA PRINCE,)
)
 Defendant.)

DEFENDANT'S MOTION TO DISCLOSE GIGLIO MATERIAL

Comes now Defendant, by her attorney, John D. Stobbs II, and for her Motion to Disclose *Giglio* Material states:

1. On November 5, 2008 Defendant filed a Motion For Disclosure of Impeaching Information (Document 73) requesting among other things:

“2. Any and all records and information revealing prior misconduct or bad acts attributed to the witness.”

3. Defendant also requested:

“9. Any and all personal files for the witness; the existence and identity of all federal, state and local government files for the witness; and the existence and identity of all official internal affairs, internal investigation or public integrity investigation files relating to or connected with each witness who was or is a law enforcement officer or agent.”

4. Defendant has reason to believe that an agent involved in the investigation herein and who assisted in procuring a statement from Defendant was punished for not properly following FBI procedures vis-a-vis a bank robbery.

5. This sort of information fits squarely within the parameters of *Giglio v. United States*, 405 U.S. 150, 92 S.Ct. 763, 31 L.Ed. 2d 104 (1972) and its progeny and as such should be disclosed to Defendant.

WHEREFORE, Defendant requests that this Honorable Court grant her Motion and require the Government to disclose any *Giglio* material.

TARA PRINCE

STOBBS LAW OFFICES

BY:

/s/ John D. Stobbs, II

John D. Stobbs II, NO. 06206358

Attorney for Defendant

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Alton, Illinois 62002

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CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2009 a copy of the attached *Motion to Disclose Giglio Material* was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Mr. Steve Weinhoef
Assistant U.S. Attorney
Nine Executive Drive
Fairview Heights, Illinois 62208

STOBBS LAW OFFICES

/s/John D. Stobbs, II
307 Henry St. Suite 211
Alton, Illinois 62002

Activity in Case 3:07-cr-30193-JPG-CJP USA v. Krpan et al Motion for Disclosure

From: ilsd_nef@ilsd.uscourts.gov

Sent: Thu 7/16/09 1:48 PM

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U.S. District Court

Southern District of Illinois

Notice of Electronic Filing

The following transaction was entered by Stobbs, John on 7/16/2009 at 1:48 PM CDT and filed on 7/16/2009

Case Name: USA v. Krpan et al

Case Number: [3:07-cr-30193](#)

Filer: Dft No. 2 - Tara Morgan

Document Number: [169](#)

Docket Text:

[MOTION for Disclosure by Tara Morgan. \(Stobbs, John\)](#)

3:07-cr-30193-2 Notice has been electronically mailed to:

Grant J. Shostak

James E. Crowe

John D. Stobbs , II

Melissa A. Day , AFPD

Steven D. Weinhoef

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Document description:Main Document

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[STAMP dcecfStamp_ID=1047403380 [Date=7/16/2009] [FileNumber=1144434-0]
][c2dd692d056de84d8ab6ddb9279d4e2f0e17092915604e77c03c5c2c8c810cfbdf4



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July 17, 2009

Ms. Tara Prince
511 E. Jackson Street
Du Quoin, Illinois 62832

RE: U.S.A. v. Prince
No. 07-CR-30193-JPG

Dear Ms. Prince:

Enclosed please find copies of the following documents filed July 16, 2009:

1. Defendant's Motion to Compel Government to Disclose Its Experts;
2. Defendant's Motion to Dismiss Indictment on Grounds of Duplicity, or in the alternative to redact Paragraphs 1-65, 70-73, 79, 80, 8, 84, and 85 and Memorandum in Support;
3. Defendant's Motion to Dismiss Superseding Indictment for Failure to Allege Elements Essential to a Conviction of Mail or Wire Fraud;
4. Defendant's Motion to Disclose Giglio Material; and
5. Defendant's Motion to be Referred to as Tara Prince instead of Tara Morgan.

If you have any questions regarding the foregoing, please contact me at your convenience.

Very truly yours,

STOBBS LAW OFFICES

BY:


John D. Stobbs II

JDSII:cw
Enclosure

Motions[3:07-cr-30193-JPG-CJP USA v. Krpan et al](#)**U.S. District Court****Southern District of Illinois****Notice of Electronic Filing**

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Case Number: [3:07-cr-30193](#)
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Docket Text:**[MOTION for Disclosure by Tara Morgan. \(Stobbs, John\)](#)****3:07-cr-30193-2 Notice has been electronically mailed to:**

Grant J. Shostak gshostak@shostaklawfirm.com, rmense@shostaklawfirm.com

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] [c2dd692d056de84d8ab6ddb9279d4e2f0e17092915604e77c03c5c2c8c810cfbdf4
0c63208f828e71f97d081f70fdc960d800d549557aec31812b80fc26f520f]]

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