Motion for Discovery

DISTRICT COURT WASHINGTON CO OK
JILL L. SPITZER COURT CLERK
FILED
JUL 11 2024
BY [signature] DEPUTY

IN THE DISTRICT COURT OF WASHINGTON COUNTY
STATE OF OKLAHOMA

State of Oklahoma, Plaintiff,
vs.
Flynn Robert Martin, Defendant.
Case No. CM24301

MOTION FOR DISCOVERY

COMES NOW the Defendant, Flynn Robert Martin, and respectfully moves this Honorable Court for an Order compelling the Plaintiff to produce discovery materials pursuant to the Oklahoma Criminal Discovery Code, Oklahoma Statutes Annotated, and relevant constitutional provisions. In support of this motion, the Defendant states as follows:

1. **Background**
    - The Defendant was arrested on July 5, 2024, and has been charged with "Possession of Controlled Dangerous Substance (Amphetamine/Opioids)" under 63 O.S. § 2-402, a misdemeanor.
    - The Defendant has filed a motion for the appointment of a public defender, which was submitted to the court on July 9, 2024, but has yet to be adjudicated.
2. **Request for Discovery**
    - The Defendant requests that this Court order the Plaintiff to produce the following discovery materials:
        1. **All Body Camera Footage:**
            - From Officer Vincent Butters, Corporal Cody Loyd, and any other officers present during the stop, search, and arrest on July 5, 2024.
        2. **All Dash Camera Footage:**
            - From the cruisers involved in the stop and subsequent search.
        3. **K9 Unit Records:**
            - Comprehensive records pertaining to the K9 unit involved, including training records, certification, and performance logs.

4. **Police Reports:**
    - Complete copies of all arrest reports, incident reports, and any supplemental reports filed by Officer Vincent Butters, Corporal Cody Loyd, and any other officers involved in the incident.
5. **Radio Traffic:**
    - All dispatch recordings and radio communications related to the stop, search, and arrest.
6. **Jail Records:**
    - All booking records, intake forms, and related documents created during the Defendant's detention at the Washington County Jail.
7. **Evidence Logs:**
    - Detailed logs and chain of custody records for all evidence collected in connection with this case.
8. **Test Results:**
    - Complete results of any forensic tests conducted on the substance seized from the Defendant's vehicle.
9. **Witness Statements:**
    - Statements from all witnesses, including but not limited to officers, regarding the events of July 5, 2024.
10. **Identity of Unidentified Male:** - The identity and statements of the unidentified male who was riding with Officer Vincent Butters in his patrol car during the stop, arrest, and transport to the jail.

3. **Legal Basis**
    - Pursuant to the Oklahoma Criminal Discovery Code and 22 O.S. § 2002, the Defendant is entitled to the aforementioned materials to ensure a fair trial. Furthermore, the United States Constitution guarantees the Defendant's right to due process under the Fourteenth Amendment, which encompasses the right to obtain exculpatory evidence and adequately prepare a defense.

WHEREFORE, the Defendant respectfully requests that this Honorable Court grant this Motion for Discovery and compel the Plaintiff to produce the requested materials without delay.

Respectfully submitted,

Flynn Robert Martin
4413 E. Whitman St.
Tucson, AZ 85711
520-869-2821

Dated: July 11, 2024

Certificate of Service:

I hereby certify that a true and correct copy of the foregoing Motion for Discovery was delivered to the Prosecuting Attorney's Office on this 11th day of July, 2024.

Flynn Robert Martin

