VIRGINIA:

IN THE CIRCUIT COURT FOR ROANOKE COUNTY

COMMONWEALTH OF VIRGINIA,	)	
	)	
	)	**Case Nos.: CR23000245-00**
v.	)	**CR23000246-00**
	)	**CR23000247-00**
TYLER KEITH JONES,	)	**CR23000342-00**
	)	
Defendant,	)	
	)	

MOTION TO SET ASIDE THE VERDICT AND MEMORANDUM IN SUPPORT THEREOF

COMES NOW, the Defendant, Tyler K. Jones (the "Defendant"), by counsel, and hereby moves this Court to set aside the jury verdict rendered March 7, 2024 and to order a new trial. In support thereof, Defendant states as follows:

PRELIMINARY STATEMENT

Lane Thomas ("Thomas") is a cancer. His life as a professional snitch infects every case he touches and abrogates justice on every level. Determined to convict the Defendant, the Commonwealth worked with Thomas, but they were not immune from his contamination. In dealing with Thomas, the Commonwealth failed to investigate his background, failed to make disclosures required by *Brady v. Maryland*, 373 U.S. 83 (1963), failed to correct false testimony, and violated the Defendant's due process rights. These failures, which include the lack of disclosure of monetary and other benefits to Thomas, mandate that the Defendant receive a new trial. This is a serious issue and the jury's verdict cannot stand despite the system's inherent desire to protect a verdict rendered by twelve citizens.

FACTUAL BACKGROUND

I. Pre-trial Disclosures by the Commonwealth

At trial, the Commonwealth called Thomas to testify. Thomas was the subject of a pre-trial motion which compelled the disclosure of his identity. His cooperation was disclosed 11 days before trial. At that time, the Commonwealth made no disclosures about Thomas' location, his status in protective custody, payments or benefits given to Thomas and other information which impacted his credibility, bias, and trial testimony. Three days after disclosing Thomas as a witness, the Commonwealth disclosed (1) Thomas' prior interview with law enforcement, (2) his criminal history, (3) that Thomas had been released from jail on an extradition warrant to accommodate his testimony in this case, (4) potential inconsistencies in his statements during trial preparation meetings, and (5) the fact that he had previously testified as a snitch. This disclosure did not include the nature of Thomas' prior cooperation testimony, the case(s) or names of the defendants in the cases in which testified or any other information about Thomas' prior testimony. Defense counsel immediately made a verbal request for information concerning his prior snitch testimony. Nor did the disclosure contain any information about monetary or other benefits Thomas received before trial.

At 5:11 p.m. the night before trial, the Commonwealth disclosed, via e-mail, that Thomas testified in a case involving Mark Lankford in Idaho and another murder case. No other details were given. Defense counsel immediately responded to this disclosure and asked, "so two murder cases?" The Commonwealth responded "Yes. That's my

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understanding." Less than an hour later, defense counsel pressed the issue and asked: "Do you know anything else? I think I need to have this information before he testifies or immediately after under Giggilo. (sic)." No other information was provided. *See* **Exhibit A**. At this time, it was defense counsel's understanding that the Commonwealth had not discussed Thomas' prior testimony with him or sought to gather the requested information from Thomas.

On the morning of trial, the Commonwealth disclosed two previously undisclosed phone calls that Thomas made to law enforcement. These phone calls contained statements which contradicted those Thomas made in his formal interview with law enforcement. This untimely disclosure caused a delay in the start of the trial to allow defense counsel to investigate these statements.

II. Trial begins and Thomas testifies.

Thomas testified on the first day of trial. During his testimony, Thomas denied that he was expecting any benefit from his testimony, that he had not received any benefits or consideration for his testimony, and he was cooperating, to paraphrase, because it was "the right thing to do."

Thomas was cross-examined regarding his prior testimony in the Lankford case and the case of David J. Meister. Regarding the Lankford case,[1] Thomas downplayed his lies and the Idaho Supreme Court's finding that he provided false testimony about benefits he received from the prosecution in that case. He also downplayed the fact that he was paid

[1] *See Idaho v. Lankford*, 162 Idaho 477, 484, 399 P.3d 804 (2017) (holding that Thomas' trial testimony about the benefits he received was "false and misleading").

monetary sums from the prosecution in connection with his testimony in the Lankford case.

Thomas' did admit, however, that he used his connections with Special Agent Richardson and Chief Deputy Commonwealth's Attorney Aaron Lavinder to secure his release from incarceration on a Pennsylvania extradition warrant but denied that he received any other benefit for his testimony. At the end of this testimony, he was released as a witness.

III. The Commonwealth makes a remarkable disclosure after Thomas testified.

The day after Thomas testified, the Commonwealth approached defense counsel during a recess and advised that it failed to disclose information regarding Thomas. The Commonwealth advised that (1) Thomas had been in protective custody for approximately one month before trial; (2) Thomas was paid for or given the benefit of a hotel room during this time; and (3) Thomas may have received other monetary or gratuitous benefits during this time. Defense counsel was provided a generic hotel name, but no other information was disclosed. This information was not disclosed before Thomas testified nor has the Commonwealth disclosed the entire listing of benefits (i.e. total sums paid to Thomas or total monetary benefit Thomas received before trial) the been disclosed by the Commonwealth to date.[2]

ARGUMENTS & AUTHORITIES

I. THE COMMONWEALTH'S DISCOVERY FAILURES VIOLATED THE DEFENDANT'S DUE PROCESS RIGHTS.

[2] Along with the filing of this Motion, Defendant is submitting a Freedom of Information Act Request to the Virginia State Police for the complete ledger of the benefits provided to Thomas.

a. *Brady* Disclosure Standards.

Pursuant to *Brady*, the Commonwealth has a duty to disclose exculpatory and impeachment evidence to an accused, a duty which Rule 3A:11(a)(2) of the Rules of the Supreme Court of Virginia emphasizes a duty which lies with the Commonwealth Attorney: "The constitutional and statutory duties of the Commonwealth's attorney to provide exculpatory and/or impeachment evidence to an accused supersede any limitation or restriction on discovery provided pursuant to this Rule." *See also Burns v. Commonwealth*, 261 Va. 307, 328 (2001) ("In *Kyles v. Whitley*, 514 U.S. 419, 437 (1995), the Supreme Court of the United States recognized that it is the individual prosecutor [who] has a duty to learn of any favorable evidence known to the others acting on the government's behalf in the case, including the police.").

The suppression by the prosecution of evidence favorable to the defendant "violates due process where the evidence is material either to guilt or to punishment, irrespective of the good faith or bad faith of the prosecution." *Brady*, 373 U.S. at 87. "There are three components of a true *Brady* violation: The evidence at issue must be favorable to the accused, either because it is exculpatory, or because it is impeaching; that evidence must have been suppressed by the [Commonwealth], either willfully or inadvertently; and prejudice must have ensued." *Strickler v. Greene*, 527 U.S. 263, 281–82 (1999). Evidence is "favorable to the accused" under *Brady* if it is either exculpatory or impeaching. *Strickler*, 527 U.S. at 281-82. More specifically, the Supreme Court has held that evidence which would be "advantageous" to the defendant qualifies under *Brady*. *See Banks v. Dretke*, 540 U.S. 668, 691 (2004).

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As such, the pertinent question when determining whether the Commonwealth acted prudently when it failed to disclose evidence is whether it could have impacted defense strategies or had a reasonable probability of impacting the trial in any way. "A reasonable probability does not mean that the defendant 'would more likely than not have received a different verdict with the evidence,' only that the likelihood of a different result is great enough to 'undermine confidence in the outcome of the trial.'" *Kyles*, 514 U.S. at 434 (citations omitted).

b. *Gigilo* Disclosure Standards.

Broadly speaking, to establish a due process violation under *Giglio*, the Defendant must show that there was a concealed promise or agreement, and that the concealment was material and therefore prejudicial. "*Giglio* and *Napue* set a clear precedent, establishing that where a key witness has received consideration or potential favors in exchange for testimony and lies about those favors, the trial is not fair." *Tassin v. Cain*, 517 F.3d 770, 778 (5th Cir. 2008). In *Napue v. Illinois*, 360 U.S. 264, 270 (1959), the Government's principal witness testified that "he had received no promise of consideration in return for his testimony" when "the Assistant State's Attorney had in fact promised him consideration…." 360 U.S. at 265. Notwithstanding his knowledge, the Assistant State's Attorney did not correct the witness's testimony. In holding that such a failure to correct testimony violated the defendant's due process rights, the Supreme Court reasoned "[t]he jury's estimate of the truthfulness and reliability of a given witness may well be determinative of guilt or innocence, and it is upon such subtle factors as the possible interest of the witness in testifying falsely that a defendant's life or liberty may depend."

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Id. at 269. In *Giglio*, building on *Napue*, the Supreme Court ruled that not only is failure to correct perjured testimony a due process violation, but that the Government is required to disclose such agreements and understandings. *Giglio*, 405 U.S. at 154-55 (reversing conviction where "Government's case depended almost entirely on [a particular witness]'s testimony" and Government failed to disclose the agreement because "credibility as a witness was therefore an important issue in the case, and evidence of any understanding or agreement as to a future prosecution would be relevant to his credibility and the jury was entitled to know of it"). Under *Giglio*, failure to disclose is material and thus prejudicial, if "the false testimony could … in any reasonable likelihood have affected the judgment of the jury…" 405 U.S. at 154 (*quoting Napue*, 360 U.S. at 271). Prejudice is said to exist "when the government's evidentiary suppression undermines confidence in the outcome of trial." *Kyles*, 514 U.S. at 434.

c. The failure to disclose Thomas' protective custody and Payment or benefits to Thomas violated *Brady*.

There is no doubt that benefits or payments bestowed to a confidential informant such as those given to Thomas are required to be disclosed pursuant to *Brady*. This is settled law. The Supreme Court has stated that it is "beyond genuine debate" that an informant's paid status qualifies as "evidence advantageous" to a defendant.[3] *See Banks v. Dretke,* 540 U.S. 668, 691 (2004). Multiple other Supreme Court, federal, and state cases have acknowledged the dubious nature of compensated informant testimony and require the

[3] The Commonwealth's disclosure of this evidence further highlights its exculpatory nature and the fact that Thomas' compensation qualifies as Brady material. If not, why disclose it at all? It appears that the Commonwealth was attempting to correct its discovery failures. This is because it was apparent to the Commonwealth that a *Brady* violation occurred. But as discussed herein, the late disclosure does not save the Commonwealth from the relief sought herein.

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prosecution to disclose the compensation to the defense. In every case, courts stressed that the testimony of a compensated jailhouse informant is inherently suspect, simply by the fact that when a benefit is given in exchange for "helpful" testimony, it creates in the informant a strong incentive to lie. *United States v. Bagley*, 473 U.S. 667, 676 (1985); *Giglio*, 405 U.S. at 153 (1972); *Napue*, 360 U.S. at 269-70; *Ruetter v. Solem*, 888 F.2d 578,581 (8th Cir. 1989); *Schofield v. Palmer*, 621 S.E.2d 726, 731 (Ga. 2005) ("The habeas court concluded that the State must have believed that [the informant's] evidence was important because it paid $500 for it, and that the State must also have believed that knowledge of the payment would have affected its case against [the defendant] because it went to such great lengths to conceal it."); *Dodd v. State*, 993 P.2d 778, 784 (Okla. Crim. App. 2000). This motivation to concoct incriminating statements is precisely the type of impeachment evidence that *Brady* requires to be disclosed.

This is especially true of a professional snitch like Thomas, who has a proven track record of lying about benefits. This should have heightened the Commonwealth's attention to detail and mandated the timely disclosure of all benefits Thomas received for his testimony. Again, it was *never* disclosed to defense counsel that Thomas received monetary benefits or protective custody *prior* to his testimony.

i. **The Late Disclosure Does Not Save The Commonwealth.**

Due process requires that disclosure of exculpatory and impeachment evidence material to guilt or innocence be made in sufficient time to permit the defendant to make effective use of that information at trial. *See, e.g. Weatherford v. Bursey*, 429 U.S. 545, 559 (1997); *United States v. Farley*, 2 F.3d 645, 654 (6th Cir. 1993). There is no dispute that the disclosure regarding Thomas occurred after the trial began and after Thomas testified. At this point, the defendant had no ability to recall Thomas because he was excused by the Court.

This presented the Defendant with the proverbial Hobsons choice. Should counsel ask for a mistrial? Or should counsel await the verdict and file a motion for a new trial? Neither option is palatable in the middle of a jury trial. The Defendant chose to wait and file this Motion, but this choice cannot be held against him as it was forced upon him by the Commonwealth's constitutional failures. Further, both the mistrial request and a motion for a new trial are two paths that lead to the same place- a new trial for the Defendant.

d. *Gigilo* Was Also Violated.

Thomas lied about the benefits he received from the Commonwealth during trial. Again, Thomas' testimony was clear: he was not motivated to lie because he was not receiving any benefit. According to Thomas, his motives were rooted in justice. But that was false. At a minimum, he had received a month-long free stay in a hotel paid for by the Commonwealth and he also received the benefit of protective custody. It is likely that he received other benefits such as meals. Basically, Thomas used his status as a snitch to have an all-expenses paid vacation to beautiful southwest Virginia. And he lied about it at trial.

This lie was never corrected by the Commonwealth on redirect or addressed in any way. Thus, the jury was permitted to base its verdict on testimony the Commonwealth knew to be false at the time it was made. Thomas' lies were permitted to go unchecked because the Commonwealth failed to meet its obligation under *Naupe*.[4]

A criminal defendant's due process rights are violated when the prosecutor knowingly does not correct false testimony of its witnesses. *See Napue*, 360 U.S. at 264. When false testimony "appears" in a criminal trial, and the government is aware of the falsity, the prosecutor cannot remain "silen[t]," but instead "has the responsibility and duty to correct what [it] knows to be false and elicit the truth." *Id.* at 270. A *Napue* violation occurs only when the prosecutor knew, or should have known, that the testimony was false. *See Bagley*, 473 at 679 n.8 & 9 (1985). This is a complementary and distinct due process right that exists outside of *Brady*. Defendant's due process rights were violated when the Commonwealth permitted Thomas' false testimony to permeate this trial. And it was the Commonwealth who had the duty to fix it because they knew or should have known it was false. This did not happen, and the Commonwealth's failures mandate a new trial.[5]

i. Effective cross-examination cannot cure a *Brady* or *Gigilo* violation.

[4] The question of what else Thomas may or may not have received is still open? Did the Commonwealth pay for Thomas' meals during his hotel stay? What other benefits did he receive during his stay in Roanoke?

[5] As the Supreme Court of the United States once powerfully wrote:

> The [prosecutor] is the representative not of an ordinary party to a controversy, but of a sovereignty whose obligation to govern impartially is as compelling as its obligation to govern at all; and whose interest, therefore, in a criminal prosecution is not that it shall win a case, but that justice shall be done. As such, he is in a peculiar and very definite sense the servant of the law, the twofold aim of which is that guilt shall not escape or innocence suffer. He may prosecute with earnestness and vigor—indeed, he should do so. But, while he may strike hard blows, he is not at liberty to strike foul ones. It is as much his duty to refrain from improper methods calculated to produce a wrongful conviction as it is to use every legitimate means to bring about a just one.

Berger v. United States, 295 U.S. 78, 55 S.Ct. 629 (1935).

The American Bar Association Rules of Professional Conduct place a heightened duty on prosecutors. See R. 3.8 of the Model Rules of Professional Responsibility ("Special responsibilities of a Prosecutor").

False testimony is a frequent factor in wrongful convictions, and there is reason to doubt that the defense can effectively prove the falsity of the testimony by government witnesses. Juries afford the government witnesses a presumption of credibility that defendants cannot reliably eliminate through cross examination. Moreover, defense counsel as a practical matter cannot feasibly rebut every possible falsity on the spot during trial. Any argument that Thomas' character and veracity were effectively attacked during trial cannot alleviate the Commonwealth's duty to disclose impeachment material- nor can it make the undisclosed evidence less material. *See Williams v. Maryland,* 152 Md. App. 190, 831 A.2d 501(Md. App. 2003) (rejecting government's argument that the undisclosed information was not material because appellant's trial counsel had "thoroughly attacked" the [informant's] character on cross examination.)

Finally, a defendant's right to appeal does not alleviate this concern because it will be difficult to know exactly how much weight a jury placed on the false testimony- a difficulty compounded by the deference given to a jury's view of a witness's credibility.

e. Defendant was prejudiced by the non-disclosure.

There is not doubt that the Defendant was prejudiced by the non-disclosure. Thomas' testimony was a key factor at trial. He bolstered the victim's testimony and was the only other witness who could corroborate the eyewitness account of the shooting. He provided a vital link between the criminal conduct and the Defendant. His testimony further rebutted the defense's alternate shooter theory and Thomas specifically testified that Paul Wiley was not able to be the shooter. Thus, Thomas' credibility and believability were key factors at the trial. This notion is buttressed by the fact that the Commonwealth referred to Thomas' testimony in its closing and made his account a key fact to the jury in its final argument.

Defense counsel cross-examined Thomas' about his criminal record, his testimony in the Idaho cases, his extradition release, and his conflicting statements. Nevertheless, counsel had no direct evidence with which to cross-examine Thomas as to his receipt of monetary benefits or protective custody status. For these reasons, it is impossible to say, if the jury had been informed of the "totality of the circumstances" surrounding Thomas' status as a "paid" informant and the benefit of proactive custody (which included a paid relocation to Roanoke, Virginia), there would be neither a substantial possibility nor a reasonable probability "that the outcome would have been different." Defense counsel was far less effective than it would have been had counsel known of Thomas' status and the benefits he received. This is the exact prejudice that is contemplated by a *Brady* violation, and it mandates that the Defendant receive a new trial. *See Burrows v. Commonwealth.* 17 Va.App. 469, 438 S.E.2d 300 (1993) ("When the 'reliability of a given witness may well be determinative of guilt or innocence' evidence affecting the credibility of that witness should not be concealed by the prosecution.")

This prejudice was further exacerbated, as discussed above, by the Commonwealth's failure to correct Thomas' false and misleading testimony. The Commonwealth went to great lengths to paint Thomas as a credible witness. They asked him questions designed to show the jury that Thomas was motivated by altruistic means. Thomas, however, never disclosed that he was receiving monetary benefits for his testimony or that he was in protective custody. These were *benefits* that he *received* for his testimony. The Commonwealth knew this and should have known that this may have motivated his testimony, but they never corrected Thomas' testimony. This left the jury with the impression that Thomas was cooperating for proper purposes, but that was not the case. This violates *Napue*. When a prosecutor fails to fulfill his "duty to correct what he knows to be false and elicit the truth," he "prevent[s] . . . a trial that could in any real sense be termed fair." *Napue*, 360 U.S. at 270; *see also United States v. Agurs*, 427 U.S. 97, 103 (1976) ("In a series of . . . cases, the Court has consistently held that a conviction obtained by the knowing use of perjured testimony is fundamentally unfair."); *Commonwealth v. Manigo,* Case nos.: 2008-1322 & FE-2008-2115, (Va. Cir. Fairfax 2009) (Judge David Schell holding that [t]The Court is of the opinion that the failure to correct the testimony of Antonio Wilson and Richey Price constitutes a violation of due process under the U.S. Constitution, amendment XIV as explained in Napue."). A new trial is warranted for this failure as well.

f. Defendant was further prejudiced by the Commonwealth's willful blindness and late disclosures.

The Defendant suffered additional prejudice from the Commonwealth's failure to investigate Thomas' background and the late disclosure of his prior testimony as a confidential informant. On the night before trial, the Commonwealth disclosed limited information about Thomas' prior testimony. *See* **Exhibit A**. Despite knowing Thomas' past status as a confidential informant, the Commonwealth took *zero* steps to investigate his prior testimony or any facts surrounding the Idaho cases. This "blind eye" to Thomas prior record was an impermissible tactic.

A prosecutor has a duty to learn of any favorable evidence known to the others acting on the government's behalf in the case. *Kyles,* 514 U.S. at 437. They cannot ignore this obligation. Here, defense counsel repeatedly requested information regarding Thomas' prior testimony. The Commonwealth only provided one case name and no additional information. This forced defense counsel, on the night before trial, to spend valuable trial preparation time researching Thomas' background and history with limited investigatory means.

Counsel did not have time to seek transcripts, interview participants or do anything beyond simple Google searches to investigate Thomas' prior testimony. This prejudiced the Defendant in the preparation of his cross-examination of Thomas. And this prejudice, again, lays at the feet of the Commonwealth. This all could have been avoided if the Commonwealth, who has all the police power at its disposal, had simply asked Thomas about his prior testimony and provided that information to defense counsel when it was requested *eight days* prior to trial. Instead, the Commonwealth took no action. This further violated the Defendant's due process rights.

What exactly was defense counsel supposed to do? Ask for a continuance on the morning of trial when the jury was there and present? That is simply untenable in this jurisdiction. Even if defense counsel would have desired a continuance, the morning of trial was fraught with other issues related to other late disclosures by the Commonwealth that caused a delay in the trial. This distraction, due to the Commonwealth's discovery failures, further hindered the Defendant's efforts in addressing or investigating Thomas' history of lying under oath.

CONCLUSION

On these facts, a new trial is warranted. Fundamental fairness and constitutional protections cannot let a verdict stand- no matter the effort, expense, or hardship in obtaining it. This is not a situation where the Court need to examine the motivations or character of the Commonwealth, for those are not in question, but the Court need only look at the timing of the disclosures and Thomas' himself to order a new trial. And there is more, the nature of the benefits to Thomas are still unknown and still unqualified. This is also a problem. Other problems also exist- such as the willful blindness to Thomas' prior history and the late disclosures on the eve of trial. It's all just too much and justice demands a new trial.

Respectfully Submitted,
TYLER KEITH JONES

By:______________________
Of Counsel

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Counsel for Defendant

Filed in the Clerk's Office
Circuit Court of
Roanoke County, VA
MAR 28 2024
Deputy Clerk

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was sent to the following Office of the Commonwealth's Attorney for Roanoke County, via hand-delivery this 28th day of March 2024.

Aaron Lavinder, Esquire
Chief Deputy Commonwealth's Attorney
County of Roanoke
Roanoke County Courthouse
305 East Main Street
Salem, VA 24153

Filed in the Clerk's Office
Circuit Court of
Roanoke County, VA

MAR 28 2024

Deputy Clerk

AARON B. HOUCHENS, P.C.
Salem, Virginia

EXHIBIT A

Filed in the Clerk's Office
Circuit Court of
Roanoke County, VA

MAR 28 2024

Deputy Clerk

aaron@houchenslaw.com

From:	Aaron Houchens <aaron@houchenslaw.com>
Sent:	Monday, March 4, 2024 6:06 PM
To:	Aaron T. Lavinder
Subject:	Re: CI Info

Do you know anything else? I think I need to have this information before he testifies or immediately after under Giggilo

Sent from my iPhone

On Mar 4, 2024, at 5:17 PM, Aaron T. Lavinder <alavinder@roanokecountyva.gov> wrote:

Yes. That's my understanding.

Aaron

From: Aaron Houchens <aaron@houchenslaw.com>
Sent: Monday, March 4, 2024 5:15 PM
To: Aaron T. Lavinder <alavinder@roanokecountyva.gov>
Subject: [EXTERNAL] - Re: CI Info

So two murder cases?

Sent from my iPhone

On Mar 4, 2024, at 5:11 PM, Aaron T. Lavinder <alavinder@roanokecountyva.gov> wrote:

Aaron,

The defendant's name in the prior case the CI testified in is Mark Lankford. The case happened in Grangeville, Idaho. He testified in another homicide case as well, but I don't have the defendant's name on that one.

Aaron

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ATTORNEY AT LAW

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Aaron B. Houchens
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March 28, 2024

Michael Galliher, Clerk
Roanoke County Circuit Court
P.O. Box 1126
Salem VA 24153

RE: Commonwealth v. Tyler Keith Jones
Case Number: CR23000245-00, CR23000246-00, CR23000247-00 & CR23000342-00

Dear Mr. Galliher:

I hope this letter finds you well.

Enclosed please find a Motion to set aside the verdict and memorandum in support thereof for filing in the above matters.

Should you have any questions, please do not hesitate to contact me. Until then, I remain;

Very truly yours,

Aaron B. Houchens

ABH:mam
Enclosure
cc: Tyler Keith Jones (w/encl.)
Aaron Lavinder, Esq. (w/encl.)(via Hand delivery)
Honorable Charles N. Dorsey, Judge. (w/encl.)(via Hand delivery to chambers)

Filed in the Clerk's Office
Circuit Court of
Roanoke County, VA
MAR 28 2024
Deputy Clerk

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March 28, 2024

Michael Galliher, Clerk
Roanoke County Circuit Court
P.O. Box 1126
Salem VA 24153

RE: Commonwealth v. Tyler Keith Jones
Case Number: CR23000245-00, CR23000246-00, CR23000247-00 & CR23000342-00

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ABH:mam
Enclosure
cc: Tyler Keith Jones (w/encl.)
Aaron Lavinder, Esq. (w/encl.)(via Hand delivery)
Honorable Charles N. Dorsey, Judge. (w/encl.)(via Hand delivery to chambers)

3/28/24
Set hrg. on this motion before sentencing hearing.
CND