

**FILED**  
 IN DISTRICT COURT  
 CHOCTAW COUNTY, OKLAHOMA  
 JAN 16 2018  
 Laura Sumner, Court Clerk  
 Deputy

**IN THE DISTRICT COURT OF CHOCTAW COUNTY,  
 STATE OF OKLAHOMA**

STATE OF OKLAHOMA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 JONATHAN L. BRADLEY, )  
 )  
 Defendant. )

Case No. CM-17-274  
 Judge Baze

**DEFENDANT'S FIRST MOTION TO COMPEL DISCOVERY**

COMES NOW the Defendant and moves the Court for its ORDER compelling the production of certain specific discovery and shows the following.

Defendant filed his *Motion for Discovery* herein December 18, 2017. The State emailed its responses to the *Motion for Discovery* to the undersigned on December 18, 2018. On December 28, 2017, the undersigned emailed the plaintiff requesting further production of certain, specific discovery. [See email at "Exhibit A"]. The certain, specific discovery requested in that email is expressly alluded to in the narrative portion of a report dated November 16, 2017 and authored by Hugo PD Officer Daniel Teal. This report was produced to Defendant in the plaintiff's December 18, 2017 email to the undersigned. [The "Report"] [See "Exhibit B"].

The specific discovery Defendant requested on December 28, 2017 consists of the "...voluntary statement [that] was filled out and signed by [complainant] Ms. Mosley..." and the "Pictures of the scene..." that were both "...added into the report."

Defendant still does not have this evidence from the plaintiff. This evidence is discoverable per the Defendant's *Motion for Discovery* and the Oklahoma Criminal Discovery Code. Defendant respectfully moves the Court for its Order *instante* that the

State produce this material by a date certain, or if the Court does not so enter such an Order *instanter*, then set the issue for hearing, and such other relief as the Court may find just, fair and equitable.

**EXHIBIT A**

**Donald Haslam**

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**From:** Donald Haslam <don@donhaslam.com>  
**Sent:** December 28, 2017 11:16 AM  
**To:** Herman, Jeannie; dhaslam@alumni.uchicago.edu  
**Subject:** RE: bradley, j discovery m-17-274

JH,

The reports you sent me attached to the below reference a written statement by the alleged vic and scene photos that I don't have yet. Can you get them to me?

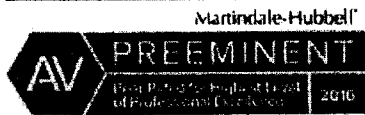
*Power is a heady thing; and history shows that the police acting on their own cannot be trusted.*

*McDonald v. United States, 335 U.S. 451, 456, 69 S. Ct. 191, 193, 93 L. Ed. 153 (1948)*

*The State that separates its scholars from its warriors will have its thinking done by cowards and its fighting done by fools.*

*Thucydides*

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George Donald Haslam

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**From:** Herman, Jeannie [mailto:Jeannie.Herman@dac.state.ok.us]  
**Sent:** December 18, 2017 12:00 PM

To: dhaslam@alumni.uchicago.edu  
Subject: bradley, J discovery m-17-274

**EXHIBIT B**

AGENCY NAME <b>Hugo Police Department</b>	ORI # <b>OK0120100</b>	CASE NUMBER <b>17-11-0800</b>
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AGGRAVATED ASSAULT/HOMICIDE CIRCUMSTANCE (APPLIES TO UCR DEFINITION ONLY) FOR AGGRAVATED ASSAULT MURDER/NON NEGLIGENT MANSLAUGHTER CHOOSE UP TO 2 _____		ADDITIONAL HOMICIDE CHOOSE 1 _____
01 ARGUMENT 02 ASSAULT ON LAW ENFORCEMENT OFFICER 03 DRUG DEALING 04 GANGLAND 05 JUVENILE GANG 06 LOVERS QUARREL	07 MERCY KILLING 08 OTHER FELONY INVOLVED 09 OTHER CIRCUMSTANCES 10 UNKNOWN CIRCUMSTANCES	11 CHILD PLAYING WITH GUN 12 GUN-CLEANING ACCIDENT 13 HUNTING ACCIDENT 14 OTHER NEGLIGENT WEAPON HANDLING 15 OTHER NEGLIGENT KILLINGS ADDITIONAL HOMICIDE CHOOSE 1 _____ 20 CRIMINAL KILLED BY PRIVATE CITIZEN 21 CRIMINAL KILLED BY POLICE OFFICER
A CRIMINAL ATTACKED POLICE OFFICER KILLED CRIMINAL B CRIMINAL ATTACKED POLICE OFFICER KILLED CRIMINAL C CRIMINAL ATTACKED CIVILIAN D CRIMINAL ABANDONED FLIGHT FROM A CRIME E CRIMINAL KILLED IN COMBINATION OF A CRIME F CRIMINAL REPEATED ARREST G UNABLE TO DETERMINE ENOUGH INFORMATION		

SUSPECT/ARRESTEE	NO #1	CODES	A - ARREST R - RUNAWAY	B - SUSPECT M MISSING	I - INSTITUTIONAL (MENTAL DETOX)	X - OTHER:					
	NAME (LAST, FIRST, MIDDLE) <b>BRADLEY, JONATHAN</b>		RACE <b>W</b>	ETHNICITY <b>B I A</b>	SEX <b>M</b>	DOB <b>09/17/87</b>	AGE <b>30</b>	HGT <b>506</b>	WGT <b>180</b>	HAIR <b>BLK</b>	EYES <b>BRO</b>
	ALIAS NAME		IDENTIFIERS		MARITAL STATUS <b>U</b>		RES. STATUS <b>R</b>				
	STREET ADDRESS <b>1609 WEST POPULAR</b>			CITY/STATE/ZIP <b>HUGO, OK, 74743</b>			PHONE				
	EMPLOYMENT / OCCUPATION / SCHOOL		BUSINESS PHONE		GANG/TRIBE/AFFIL.		SSN		DL # / STATE <b>8082879269, OK</b>		
	BOOKED / WHERE	BOOKING #	UCR ARREST OFFENSE CODE	TYPE OF ARREST	CHARGES		OSBI #				
	ARREST DATE	LOCATION OF ARREST		OST		FBI #					
	FINGERPRINT CARD *	CITED <b>Y N</b>	CITATION/WARRANT NO (S)		BAI	LOCAL ID #	WEAPON CODE(S)		MULTI CLEARANCE <b>M O N</b>		
	JUV PARENT / GDN. NOTIF. E	NAME / RELATIONSHIP OF PERSON NOTIFIED		DATE/TIME NOTIFIED		Notified BY		DISP JUV <b>H R</b>			

VEHICLE	TYPE	1-VICTIMS	3-SUSPECT	5-RECOVERED	7-STOLEN	9-OTHER
	VEHICLE	2-THEFT FROM	4-VANDALISM	6-SEIZED	8-IMPOUNDED	
	TYPE TAG NO.	STATE	YEAR	VIN	DISTINGUISHING MARKS	
	VEH. YR.	MAKE	MODEL	STYLE	COLOR	EST VALUE
IMPOUNDED BY	DATE RECOVERED	RECOVERED VALUE	RECOVERING AGENCY ORG#	NCIC# VEH/DECAL#		

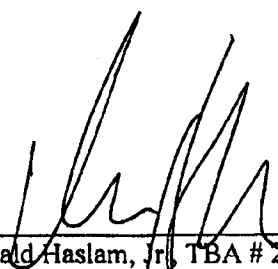
WITNESS/ RPT PERSON	CODE	NAME (LAST, FIRST, MIDDLE)	RACE	ETHNICITY	SEX	DOB	AGE	HGT	WGT	HAIR	EYES
	ADDRESS/LOCATION		CITY/STATE/ZIP		PHONE						
	EMPLOYER	ADDRESS		CITY/STATE/ZIP		PHONE					
	DR.LIC.#	SSN	OSBI #	MARTIAL STATUS		RES. STATUS <b>R N</b>					

**NARRATIVE**

ON 11/16/2017 I HUGO POLICE OFFICER DANIEL TEAL RESPONDED TO A DISTURBANCE AT 811 WEST DALTON. UPON MY ARRIVAL I SPOKE WITH ANGELIC MOSLEY WHO SATED HER COUSIN JONATHAN BRADLEY CAME OVER HER HOUSE, EXCHANGED WORDS ABOUT A FACEBOOK COMMENT. HE THEN PUNCHED HER IN THE LEFT SIDE OF THE FACE WITH WHAT SHE BELIEVED TO BE A PAIR OF BRASS KNUCKLES. SHE SUSTAINED INJURIES ABOVE AND BELOW HER LEFT EYE. BOTH INJURIES WERE ABOUT AN INCH AND A HALF LONG. ANGELIC WAS BLEEDING PROFUSELY FROM HER INJURIES. PICTURES OF THE SCENE WERE TAKEN AND A VOLUNTARY STATEMENT WAS FILLED OUT AND SIGNED BY MS. MOSLEY AND WERE ADDED INTO THE REPORT. JONATHAN FLED THE SCENE AND HAS NOT BEEN LOCATED AT THIS TIME.

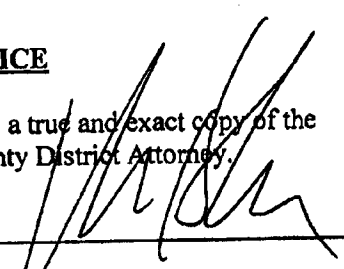
REPORTING OFFICER <b>DANIEL TEAL</b>	ID # <b>115</b>	REVIEWED BY	ID #	DATE OF REPORT <b>11/16/2017</b>
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By:

  
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[dhaslam@alumni.uchicago.edu](mailto:dhaslam@alumni.uchicago.edu)  
Counsel for Defendant

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 16, 2018 a true and exact copy of the foregoing was delivered to the office of the Choctaw County District Attorney.

  
G. Donald Haslam, Jr.