

STATE OF ILLINOIS )  
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COUNTY OF LAKE )

**IN THE CIRCUIT COURT OF THE NINETEENTH  
JUDICIAL CIRCUIT, LAKE COUNTY ILLINOIS**

**People of the State of Illinois** )

vs. )

**MARNI YANG** )

Gen. No. 09 CF 926

**PEOPLE'S MOTION – IMPEACHMENT BY PRIOR CRIMINAL CONVICTIONS**

NOW COMES the People of the State of Illinois, by MICHAEL G. NERHEIM, State's Attorney for Lake County, Illinois, by and through Jason R. Humke, Assistant State's Attorney, and moves this Honorable Court to allow for the admission into evidence of the prior criminal convictions of the individuals listed below if this matter should proceed to an evidentiary hearing and the court were called upon to evaluate their credibility. In support of said motion, the People state as follows:

1. On April 28, 2016, Jesse Delgado was convicted of the felony offenses of Aggravated Battery and Criminal Damage to Property in the circuit court of Cook County, case number 2014CR100740.
2. On November 4, 2014, Andrew Yang was convicted of the felony offense of Possession of Cannabis, in the circuit court of Cook County, case number 2014CR184470. And then on October 17, 2018, Andrew Yang was convicted of the felony offense of Possession of Cannabis With Intent to Deliver in the circuit court of Cook County, case number 2017CR014870.
3. On April 23, 1987, Tammy Fyke (AKA Tammy Koelling) was convicted of the felony offense of First Degree Murder, in the circuit court of Marion County, case 86 CF 123, Tammy Fyke was thereafter not released from confinement until September 6, 2016.
4. These convictions are for felony offenses and are within ten years of these proceedings excluding time spent in custody. *People v. Powell*, 139 Ill.App.3d 701, (2nd Dist. 1985) (noting that, for purposes of the admission of convictions for impeachment purposes, confinement tolls the time limitation on admissibility).
5. The People submit that all of these convictions are the proper subject of impeachment if these persons named within the Petition and exhibits testify or otherwise offer evidence at an evidentiary hearing because the convictions weigh heavily upon their credibility and the probative value of these convictions is not substantially outweighed by the danger of unfair prejudice.

