

IN THE CRIMINAL COURT OF HAMILTON COUNTY, TENNESSEE

STATE OF TENNESSEE

VS.

LACHARLESTON LEE HAGGARD

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Docket No 305660  
and all related charges  
and counts

HON. TOM GREENHOLTZ

**DEFENDANT LACHARLESTON LEE HAGGARD'S**  
**MOTION NO. 14 MOTION FOR BILL OF PARTICULARS**

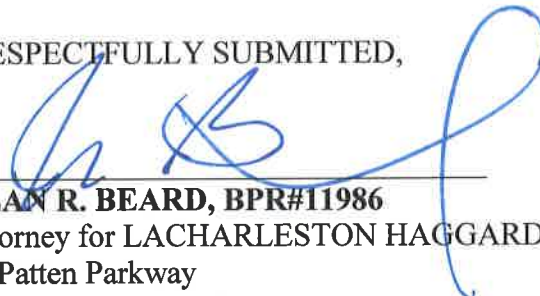
Comes the Defendant, **LACHARLESTON LEE HAGGARD**, pursuant to the Tennessee Rules of Criminal Procedure, Rules number 12(b)(1) and 7(c), and respectfully moves the Court to issue an Order requiring the State of Tennessee and all of its agents, by and through the District Attorney General to file and to provide to Counsel for the Defense a Bill of Particulars to adequately identify, describe and set out the elements and the offenses charged in this case within 30 days of the hearing of this Motion. In support of this motion, the Defense would respectfully show unto the Court that the Indictment(s) issued in this case were overly vague, broad and/or repetitious of general allegations. Said Indictments fail to state with particularity the time and place of each offense charged, such that it is not possible for the defense to prepare for the trial of this case. If this trial is allowed to proceed without the particulars, the effect will be to deny the Defendant a fair trial.

WHEREFORE the Defendant prays that this Honorable Court will issue forth an Order requiring the District Attorney General to file a Bill of Particulars to adequately identify each and every one of the elements of the offenses charged in this case as to time, place and victim and all elements of each charge and such other particulars as are known to the District Attorney General or his agents or such as may become known to the same, or as which ought to be known by the State and/or it's witnesses and agents.

FILED IN OFFICE  
2018 SEP 19 PM 3:10  
VINCE DEAN, CLERK

SCANNED

RESPECTFULLY SUBMITTED,



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**ALAN R. BEARD, BPR#11986**  
Attorney for LACHARLESTON HAGGARD  
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Chattanooga, TN 37402  
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423-266-1726 facsimile

**CERTIFICATE OF SERVICE**

I hereby certify that I mailed or otherwise delivered a true and exact copy of the foregoing motion to all parties of interest or their counsel on this 17th day of Sept., 2018.



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ALAN R. BEARD

Neil Pinkston  
District Attorney General  
600 Market Street, Suite 310  
Chattanooga, TN 37402