

**IN THE CRIMINAL COURT FOR HAMILTON COUNTY, TENNESSEE
DIVISION II**

STATE OF TENNESSEE

Plaintiff,

v.

ARTERRIUS ALLEN,

Defendant.

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No. 305636

SECOND DIVISION

Hon. Tom Greenholtz

**DEFENDANT ARTERRIUS ALLEN'S MOTION NUMBER 3:
MOTION FOR BILL OF PARTICULARS**

COMES NOW Arterrius Allen, by and through counsel, and pursuant to Rule 7(c) of the TRCrP, hereby requests that this Honorable Court enter an order requiring the District Attorney General to file a Bill of Particulars for the allegations made in the incitements against Mr. Allen.

In support thereof, Mr. Allen would show that he is facing a two count indictment for alleged involvement in a "racketeering enterprise" known as the "Athens Park Bloods Gang". Mr. Allen is named along with dozens of other Co-Defendants, yet the indictments do not specify what, if any, role or involvement Mr. Allen had in the alleged enterprise. Because of the limited information provided in the indictments, counsel for Mr. Allen cannot adequately prepare a defense to the charges.

A Bill of Particulars should provide Mr. Allen with enough information to allow a defense to be prepared to avoid prejudicial surprise at trial. State v. Hammonds, 30 S.W. 3d 294 (Tenn. 2000). Here, the indictment only provides Defendant with vague information about the charges without connecting Defendant to any of the allegations in the indictments.

WHEREFORE, premises considered, Mr. Allen prays that this Honorable Court grant the relief sought in said Motion for the reasons as stated in said Motion.

Respectfully submitted,

BY: *Terri Daugherty*
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Attorneys for Arterrius Allen

CERTIFICATE OF SERVICE

Service to all parties involved in this action shall be facilitated by the Court Clerk's Office in accordance with the Court's Case Management Order of September 26, 2018.

This 19 day of December 2018

BY: *Terri Daugherty*
Terri L. Daugherty

FILED IN OFFICE
2018 DEC 19 PM 3:49
VINCE DEAN, CLERK
BY _____ DC