

STATE OF SOUTH CAROLINA)
COUNTY OF BERKELEY)

IN THE COURT OF GENERAL SESSIONS
FOR THE NINTH JUDICIAL CIRCUIT
INDICTMENT NUMBER: 2016-GS-08-02603
WARRANT NUMBER: 2016A0810400692

2025 APR 10 PM 12:55

FILED
WC

STATE OF SOUTH CAROLINA,)
Plaintiff,)
-versus-)
MICHAEL COLUCCI,)
Defendant.)

**MOTION TO DISCLOSE WITNESS
HISTORY AND INCENTIVES**

Michael Colucci, respectfully asks this Court for the entry of an Order directing the State to make inquiry and disclose all of the following within the possession, custody, and control of the State, or the existence of which is known, or by the exercise of due diligence could become known, to the State:

1. Any and all records and information revealing prior misconduct or bad acts attributed to any of the State's proposed witness(es).
2. Any and all consideration or promises of consideration, including unwritten or "we will do our best" agreements, given to or on behalf of the witness or expected or hoped for by the witness. By "consideration," Mr. Colucci refers to anything,

whether bargained for or not, which arguably could be of value or use to a witness or to persons of concern to the witness, including but not limited to: immigration assistance; criminal immunity; assistance or favorable treatment or recommendations with respect to any criminal or other legal dispute with the State or Federal government; payments of money or reimbursement of expenses; provisions of food, clothing, shelter, transportation, or other like benefits when an appearance was required to be questioned by law enforcement, prosecutors, or to testify before a Grand Jury or any legal proceeding; or other accommodation which could arguably reveal a motive or bias by the witness in favor of the State or act as an inducement to testify or to compromise their testimony.

3. Any and all warnings, expressed or implied, made to any witness whether the State intends to call them or not, of any criminal proceeding or investigation which could be brought against the witness; or could potentially affect any probationary or deferred prosecution status of the witness; or any administrative hearing or other legal matter involving the State or Federal government and the witness.
4. The number of times that the witness has been interviewed by representatives of the State about their knowledge concerning the facts of this case and the consideration provided for their time.

Respectfully submitted,

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April 10, 2025