

FILED

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STATE OF SOUTH CAROLINA)

IN THE COURT OF GENERAL SESSIONS

COUNTY OF BERKELEY)

2025 MAY 22 PM 12:01

FOR THE NINTH JUDICIAL CIRCUIT

LEAH J. JONES, CLERK OF COURT
BERKELEY COUNTY, SC

INDICTMENT NUMBER: 2016-GS-08-2603

The State,)

v.)

Michael Colucci.)

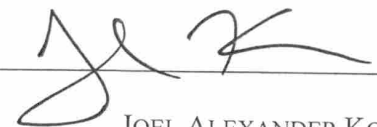
DEFENDANT)

**MOTION TO EXCLUDE REFERENCE
OR ARGUMENT TO DECEDENT'S
PRIOR DRUG AND/OR ALCOHOL USE**

The State moves for the exclusion of any testimony or argument regarding the prior drug and/or alcohol use of the deceased, Sara Lynn Colucci. Any reference to drug and/or alcohol use outside of the date of her death would be irrelevant and inadmissible under South Carolina Rules of Evidence 401 and 402. Even if deemed relevant, this testimony would confuse the issues for the jury and should be excluded under SCRE 403. The State does not object to any mention of drug and/or alcohol use occurring on May 20, 2015. Prior to any testimony being heard by the jury, the State would ask for the court to conduct an *in-camera* hearing to determine the relevancy of such testimony.

RESPECTFULLY SUBMITTED:

ALAN WILSON
ATTORNEY GENERAL

By: 

JOEL ALEXANDER KOZAK
KINLI BARE ABEE
STATE OF SOUTH CAROLINA

JUNE 16, 2025
COLUMBIA, SC

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RUTHLESS TO THE INSURANCE COMPANIES
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