

STATE OF TEXAS § IN THE 401ST
V. § DISTRICT COURT OF
PATRICIA CRIGGER § COLLIN COUNTY, TEXAS

STATE'S DISCLOSURE OF EVIDENCE FAVORABLE TO DEFENDANT

COMES NOW the State of Texas by and through Gregory S. Davis, First Assistant District Attorney, and files this Disclosure of Evidence Favorable to Defendant, and respectfully shows the Court the following:

I.

On October 21, 22, and 25, 2010, the undersigned first learned of evidence that he believes is favorable to the defendant and her co-defendants. These facts involve the manner in which the Collin County District Attorney's Office reported its employees' paid leave. More specifically, the undersigned learned that:

1. Approximately 40 employees of the Collin County District Attorney's Office were awarded paid leave in the form of "High Five" leave since January 1, 2003. The Criminal District Attorney awarded the leave in amounts ranging from one to eight hours. The supporting documents show that the paid leave time was awarded for meritorious conduct. The undersigned has found no evidence that any paid leave time was awarded for electioneering or political activity.
2. A timekeeper in the Collin County District Attorney's Office allegedly had an "off-the-record agreement" with a person in the

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 COLLIN COUNTY, TEXAS
 Gregory S. Davis

Collin County Human Resources Department to alter employees' time records.

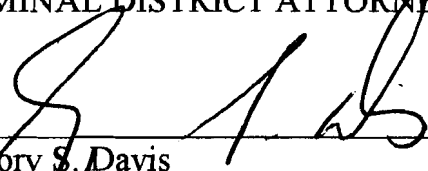
3. At least two timekeepers in the Collin County District Attorney's Office altered employees' time records to reflect that employees were at work when they were actually on "High Five" leave.
4. A timekeeper in the Collin County District Attorney's Office believes that "everyone" in the county was altering employees' time records, including persons in the Collin County Human Resources Department.
5. Per a department spokesperson, the Collin County Human Resources Department had no knowledge of the "High Five" leave program prior to June 2, 2010.
6. Per a department spokesperson, the Collin County Human Resources Department instructed all timekeepers to accurately report county employees' times.
7. An undetermined number of scheduling requests for investigators in the Collin County District Attorney's Office were destroyed without the knowledge of the Criminal District Attorney or the undersigned.

II.

While the undersigned believes that much of this newly discovered evidence will be held to be inadmissible at trial, he believes disclosure of this evidence should be made to ensure full compliance with *Brady v. Maryland*.

Respectfully submitted,

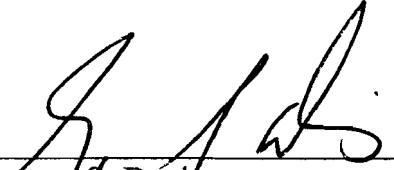
JOHN R. ROACH
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CERTIFICATE OF SERVICE

I certify that a true copy of the State's Disclosure of Evidence Favorable to Defendant has been sent via email to all counsel for Defendants CRIGGER, LITTRELL, BELL, ROBERTSON, MATHIS, and SIMPSON on this the 26th day of October, 2010.



Gregory S. Davis