STATE OF NORTH CAROLINA IN THE GENERAL COURT OF JUSTICE

COUNTY OF [XXX] SUPERIOR COURT DIVISION

Case No. [##] CRS [######]

STATE OF NORTH CAROLINA )

)

v. ) ) **DEMAND FOR SPEEDY TRIAL**

[CLIENT], )

Defendant. )

)

NOW COMES[CLIENT], the Defendant, by and through her undersigned counsel, [ATTORNEY], and hereby demands a speedy trial in this matter pursuant to Article I, § 18 of the North Carolina Constitution and the Fifth, Sixth, and Fourteenth Amendments of the United States Constitution. In making this demand, [CLIENT] states:

1. The indictment in this case alleges that [CLIENT] violated N.C. Gen. Stat. § 163A-1389(5) [or § 163-275(5)] by casting a vote in the 2016 General Election in October or November of 2016.

2. On April 21, 2017, the State Board of Elections published a Post-Election Audit Report of the 2016 general election in which it identified 441 individuals who had allegedly voted in violation of § 163-275(5) (later re-codified as § 163A-1389(5)), including five individuals in Hoke County. The State Board of Elections likely identified [CLIENT] as one of those individuals prior to the release of the audit.

3. The State did not arrest [CLIENT] or charge her with this alleged offense until [DATE].

4. The State did not indict Ms. Bratcher for this alleged offense until [DATE].

5. Until [CLIENT] receives discovery from the State, she cannot ascertain the course of the State Board of Elections’ investigation, the timing of its referral to the District Attorney, or the basis for the delay up to this point.

6. [CLIENT] has filed and served a Request for Discovery on the State concurrently with this Demand.

This the [##] day of [MONTH], [YEAR].

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[SIGNATURE BLOCK]

[CERTIFICATE OF SERVICE]