

CAUSE NO. 001-87528-2024

| | | |
|---------------------------|----------|-----------------------------|
| THE STATE OF TEXAS | § | IN COUNTY COURT |
| | § | |
| V. | § | AT LAW NUMBER 1 |
| | § | |
| RILEY DALTON MIX | § | COLLIN COUNTY, TEXAS |

**REQUEST FOR AND MOTION FOR DISCOVERY REGARDING CRIMINAL
HISTORY OF COMPLAINANT**

COMES NOW, RILEY DALTON MIX, (“Accused,”) in the above styled and numbered cause, and both *requests* discovery through service of this document, and *moves* the Court to require the District Attorney to make available to the Defendant the following documents, or information, pertaining to the complainant, **Eric July**, in the above cause:

1. TXGang Database records.
2. Prior criminal record, including convictions or deferred adjudications for felony offenses and misdemeanor offenses, particularly those misdemeanor offenses involving moral turpitude, and acts of misconduct are relevant and material for impeachment purposes and to shed light on the bias, motive, animus and ill feeling on the part of any witness testifying against the Defendant.
3. Prior juvenile adjudications.

That the said evidence, if the information requested is in possession of the State or in possession of agents under contract with the State, that the information would be exculpatory, impeaching or mitigating.

That the State should not be permitted to avoid the responsibility of requesting the proper law enforcement authorities to obtain a full and complete prior criminal record of the State's witnesses or possible witnesses, and should not be permitted to respond to this Motion by advising the Court that the District Attorney does not have any indication in his file of any prior criminal record of such witnesses simply because he has not made the necessary inquiries.

That if the District Attorney does not request the proper law enforcement authorities to obtain the above records of such witnesses and reveal all of said information to the Accused, that the District Attorney will be secreting evidence which directly affects the credibility of the witness and the weight to be given their testimony and will therefore be secreting evidence which would probably affect the verdict.

Particularized need and likelihood that said evidence will be *Brady* or *Giglio* evidence:

The Accused would show that said information, even if the information is remote, may be necessary to impeach the complainant, or place into proper context oral statements the complainant has made about this case and events relevant to acts leading up to this case on the online video platform YouTube, including:

- Eric July's statements prior to the alleged offense encouraging his critics to "pull up" to his location and to sort out their differences "like men."

- Eric July's statements subsequent to the alleged offense where he prevaricates on the meaning of "pull up," following the dates of the alleged offenses. And that he would not veil his language like this because "he used to bang."

- And that the value of the requested documents would have a tendency to show that it was less "reasonably likely" that the complainant would be "alarmed," "tormented," etc. by the alleged culpable conduct of the Accused.

And that said information probably exists:

- There are numerous articles published online referring to Eric July's life, presumably detailing an autobiographical account of his involvement in gang activity when he resided in Dallas County (including: <https://reason.com/2017/04/20/meet-eric-july-2/>).

PRAYER

WHEREFORE, PREMISES CONSIDERED, the Accused respectfully prays that this Honorable Court will order the District Attorney to request the proper law enforcement authorities to obtain the above documents and/or information of the complainant and that the District Attorney be ordered to reveal said records and information to the Accused prior to the trial of this cause, and as soon as practicable.

Respectfully submitted,

PANTHEON LEGAL GROUP, PLLC

/s/ James T. Chiles

Mark J. Streiff

Managing Partner

State Bar No. 24117510

Jodi D. Liukkonen

Partner

State Bar No. 24103339

James T. Chiles

Partner

State Bar No. 24115062

1020 Macon Street, Suite 5

Fort Worth, TX 76102

Tel: (817) 381-2216

Fax: (817) 663-2216

James.Chiles@pantheon-legal.com

Attorneys for the Accused

CERTIFICATE OF SERVICE

This is to certify that on December 27, 2024, that a true and correct copy of the above and foregoing document was served on Collin County District Attorney's Office, via the Texas Electronic Filing System.

/s/ James T. Chiles

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

James Chiles on behalf of James Chiles

Bar No. 24115062

james.chiles@pantheon-legal.com

Envelope ID: 95683277

Filing Code Description: Request

Filing Description:

Status as of 12/27/2024 4:01 PM CST

Case Contacts

| Name | BarNumber | Email | TimestampSubmitted | Status |
|-------------------|-----------|-----------------------------------|-----------------------|--------|
| Mark JamesStreiff | | mark.streiff@pantheon-legal.com | 12/27/2024 3:53:07 PM | SENT |
| Jodi Liukkonen | | jodi.liukkonen@pantheon-legal.com | 12/27/2024 3:53:07 PM | SENT |
| Matt McCready | | mmccready@collincountytx.gov | 12/27/2024 3:53:07 PM | SENT |
| John Evans | | jcevans@co.collin.tx.us | 12/27/2024 3:53:07 PM | SENT |
| Katherine Spicer | | kspicer@co.collin.tx.us | 12/27/2024 3:53:07 PM | SENT |
| James Chiles | | james.chiles@pantheon-legal.com | 12/27/2024 3:53:07 PM | SENT |