
STATE OF WISCONSIN,
Plaintiff

v.

Case No. 11 CF 390

DEMARIOUS GRAY,
Defendant

NOTICE OF PROPOSED EVIDENCE TO BE SUBMITTED,
PURSUANT TO §904.04(2), STATS.

The defendant Demarious Gray, through his attorney Joseph L. Sommers, pursuant to §904.04(2), Stats. and Whitty v. State, 34 Wis.2d 278.149 N.W.2d 557 (1967) hereby gives notice that he intends to introduce evidence at trial showing:

1. That Ashton Davis committed the crime for which Demarious Gray has been charged.

2. That Ashton Davis and Darell Fowler are members of the 'lic squad' that commits armed robberies and home invasions in the Madison area.

3. One home invasion committed by the 'lic Squad' was on February 4, 2011 at 1818 Fordem Avenue, Apartment 26.

4. The 'lic squad' stashed their guns and fruits of their crimes at 802 Vera Court, Madison, WI.

5. Madison police, especially Det. Thomas Helgren, have taken a systematic course of conduct in order to obscure the criminality and 'lic squad' status of both Davis and Fowler.

The due process rights of a criminal defendant are in essence, the right to a fair opportunity to defend against the state's accusations. State v. Evans, 187 Wis.2d 66, 82, 522