

**IN THE DISTRICT COURT OF STEPHENS COUNTY
STATE OF OKLAHOMA**

THE STATE OF OKLAHOMA,)
)
)
Plaintiff,)
)
vs.)
HEATHER DAWN CHANDLER,)
)
Defendant.)

FILED DISTRICT COURT
Stephens County, Okla.

APR 07 2026

CF-2025-109

MELODY HARPER
Court Clerk

STATE'S DISCOVERY DISCLOSURE

COMES NOW, the State of Oklahoma, by and through Assistant District Attorney Carlyn Gay Simmons, and pursuant to 22 O.S. §2002 provides the following discovery to the defendant in the above-entitled cause:

A. WITNESSES THE STATE INTENDS TO CALL FOR TRIAL:
Witnesses are those endorsed on the Information and Motions to Endorse. The Police reports and witness statements are attached. The following is a brief outline of the witnesses' expected testimony:

- 1. David Ramsey, Duncan Police Department, 100 S 7th St., Duncan, OK 73533;**
Officer Ramsey will testify to his training and experience as a law enforcement officer. He will further testify to his observations and investigation pertaining to the above-entitled cause. He will further testify to his observations and communications with the defendant and witnesses regarding the above-entitled cause and to his interview with the defendant. He will also testify to any and all attendant observations made pursuant to his position as they relate to the above-entitled cause. His testimony will be consistent with his reports;

- 2. Darius McReynolds, Duncan Police Department, 100 S 7th St., Duncan, OK 73533;**
Officer McReynolds will testify to his training and experience as a law enforcement officer. He will further testify to his observations and investigation pertaining to the above-entitled cause. He will further testify to his observations and communications with the defendant and witnesses regarding the above-entitled cause and to his interview with the defendant. He will also testify to any and all attendant observations made pursuant to his position as they relate to the above-entitled cause. His testimony will be consistent with his reports and previous testimony;

- 3. Bart Riley, Evidence Custodian, Duncan Police Department, 100 S. 7th St., Duncan, OK 73533;**
Mr. Riley will testify to the nature of his position with the Duncan Police Department. He will testify to the procedures utilized by the Duncan Police Department as it pertains to keeping and maintaining evidence. He will further testify to the steps taken in the above-entitled cause as it pertains to the maintenance of evidence in the police department's custodian. He will further testify to any and all attendant observations made pursuant to his position as they relate to the above-entitled cause. His testimony will be consistent with his reports;

4. Representative, Service Oklahoma, 6015 N. Classen Blvd., Building 4, Oklahoma City, OK, 73118;

A representative of Service Oklahoma will testify to the nature of his position with Service Oklahoma. He will testify to the procedures utilized by the Service Oklahoma as it pertains to keeping and maintaining evidence. He will further testify to driver license records for the defendant in the above-entitled cause. He will further testify to any and all attendant observations made pursuant to his position as they relate to the above-entitled cause. His testimony will be consistent with his reports;

B. DOCUMENTS COPIED BY THE DISTRICT ATTORNEY'S OFFICE AND PROVIDED TO THE DEFENDANT INCLUDE:

1. Inmate Booking Sheet dated May 6, 2025 (3 pages);
2. Case Summary Duncan Police Department Case # 25-01071 dated May 6, 2025 (1 page);
3. Probable Cause Affidavit prepared by Darius McReynolds dated May 6, 2025 (3 pages);
4. Duncan Police Department Arrest Report # 2805 dated May 6, 2025 (2 pages);
5. Officer's Impaired Driving Affidavit dated May 6, 2025 (1 page);
6. Driver's License Return for defendant dated May 6, 2025 (2 pages);
7. Duncan Police Department Incident Report # 25-01071 dated May 6, 2025 (5 pages);
8. Oklahoma Motor Vehicle Registrations Response dated May 6, 2025 (2 pages);
9. Driving Record for defendant dated May 6, 2025 (4 pages);
10. Criminal History for defendant dated May 6, 2025 (6 pages);
11. OSBI Disposition Report Form dated May 6, 2025 (1 page);
12. Complaint – Information dated May 6, 2025 (1 page);
13. Certified copy of Deferment in Stephens County CM-2020-430 (2 pages);
14. Discovery Request by defendant dated May 13, 2025 (2 pages);
15. Defendant's Formal Request for Discovery dated May 30, 2025 (5 pages);
16. Certified Motor Vehicle Record dated May 30, 2025;
17. Plea Offer (1 page);
18. Entry of Appearance for Clint Russell dated August 5, 2025 (1 page);
19. Drug Court Stay Order dated September 16, 2025 (1 page);
20. Defendant's Motion to Compel Discovery and Exhibits dated September 26, 2025 (34 pages);
21. Defendant's Request for Dismissal dated September 26, 2025 (1 page);
22. Defendant's Motion to Suppress Evidence dated September 29, 2025 (7 pages);
23. Defendant's Motion for Continuance dated October 10, 2025 (2 pages);
24. Defendant's Exhibits dated October 8, 2025 (13 pages);
25. Service Oklahoma Reinstatement Order dated November 17, 2023 (1 page);
26. Defendant's Motion to Dismiss and Motion to Suppress Evidence dated October 8, 2025 (12 pages);
27. Defendant's Sworn Statement Regarding "Expired ID Only" Dispatch Entry and Credibility Issue dated November 3, 2026 (6 pages);

28. Notice of Clarification and Preservation of Preliminary Issues dated November 3, 2025 (6 pages);
29. Addendum to Motion to Dismiss for Brady and Spoliation Violations dated November 3, 2025 (4 pages);
30. Motion to Dismiss for Brady and Spoliation Violations dated November 3, 2025 (8 pages);
31. Defendant's List of Witnesses and Exhibits dated March 30, 2026 (4 pages);
32. Information filed May 6, 2025 (2 pages);
33. Supplemental Information filed May 6, 2025 (1 page);
34. Request for Discovery dated November 13, 2025 (1 page);
35. Statement by Joe Lard dated October 20, 2025 (1 page);
36. Letter from Bart Riley dated May 13, 2025 (1 page);
37. One disc containing:
 - a. One video labeled 5512_Backseat_51_06242025222333.mp4 (0:06:02 in duration);
 - b. One video labeled 5512_Front_51_06242025222333.mp4 (0:06:26 in duration);
 - c. One video labeled WQ801B0245_110_06242025222355.mp4 (0:05:58 in duration);
38. One disc containing:
 - a. One video labeled 5512_Backseat_51_05062025012805.mp4 (0:41:30 in duration);
 - b. One video labeled WQ801B0245_110_05062025012809.mp4 (0:25:22 in duration);
39. One disc containing:
 - a. One video labeled 5509_Backseat_50_05062025012931.mp4 (0:28:10 in duration);
 - b. One video labeled 5512_Backseat_51_05062025012805.mp4 (0:41:30 in duration);
 - c. One video labeled WQ801B0245_110_05062025012809.mp4 (0:25:22 in duration);
 - d. One video labeled WQ801B0270_101_05062025012948.mp4 (0:27:29 in duration).


C. THE DEFENDANT'S STATEMENTS ARE ONLY THOSE INCLUDED IN THE OFFICERS' REPORTS, RECORDED INTERVIEWS, AND WITNESS STATEMENTS.

D. EXHIBITS FOR THE STATE INCLUDE THE ATTACHED POLICE REPORTS, AND WITNESS STATEMENTS. COPIES OF ALL OF THE AFOREMENTIONED ITEMS HAVE BEEN PROVIDED TO DEFENSE COUNSEL. ANY PHYSICAL EVIDENCE IS AVAILABLE FOR INSPECTION IN THE STEPHENS COUNTY DISTRICT ATTORNEY'S OFFICE.

E. THE STEPHENS COUNTY DISTRICT ATTORNEY'S OFFICE MAINTAINS AN "OPEN FILE" POLICY TO WHICH DEFENSE COUNSEL HAS ACCESS TO THE CONTENTS OF ENTIRE CASE FILE PERTAINING TO THE ABOVE STYLED CASE.

F. THE DISTRICT ATTORNEY'S OFFICE HAS NO EXCULPATORY EVIDENCE TO PROVIDE BUT RECOGNIZES ITS CONTINUING DUTY TO DISCLOSE SHOULD ANY EXCULPATORY OR IMPEACHMENT EVIDENCE BE DISCOVERED.

**RESPECTFULLY SUBMITTED,
JASON M. HICKS
DISTRICT ATTORNEY**




Carlyn Gay Simmons
Assistant District Attorney

CERTIFICATE OF DELIVERY

I, Carlyn Gay Simmons, certify that on the 1st day of April, 2026, a true and correct copy of a file-stamped the State's Discovery Disclosure was hand-delivered to:

David Kanehl
The Kanehl Law Firm, PLLC
1111 West Willow Avenue, Suite 200
Duncan, Oklahoma 73533
Attorney for Defendant



Carlyn Gay Simmons
Assistant District Attorney