

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

STATE OF OKLAHOMA,

Plaintiff,

v.

HEATHER DAWN CHANDLER,

Defendant.

Case No. CF-2025-109

FILED DISTRICT COURT
Stephens County, Okla.

JUN 08 2026

MELODY HARPER
Court Clerk

**DEFENDANT'S EMERGENCY MOTION TO COMPEL DISCOVERY,
FOR PRESERVATION ORDER, AND FOR SANCTIONS**

(Pro Se)

COMES NOW the Defendant, Heather Dawn Chandler, appearing pro se, and respectfully moves this Court on an emergency basis pursuant to 22 O.S. § 2002, Brady v. Maryland, 373 U.S. 83 (1963), Giglio v. United States, 405 U.S. 150 (1972), and the Fourth, Sixth, and Fourteenth Amendments to the United States Constitution, to compel the immediate production of discoverable materials that have been withheld, denied, or obstructed despite repeated lawful requests over more than twelve months. Trial is set for July 2026. The docket call is June 10, 2026.

I. PATTERN OF DENIAL AND OBSTRUCTION

A. GPS and AVL Location Data — Denied with Unsigned Response

On July 14, 2025, Defendant submitted a formal ORA request for GPS location records for all patrol units active between 1:15 a.m. and 1:45 a.m. on May 6, 2025. DPD responded: "Duncan Police Department does not have GPS tracking in its patrol units or on its officers." The records keeper refused to sign this response. Defendant documented the refusal contemporaneously. This denial is directly contradicted by Officer Ramsey's on-camera statement that McReynolds was seen "vroom right down in front of PD" — conduct implying coordinated unit movement inconsistent with a department maintaining no location tracking.

an adverse inference instruction to the jury; (4) address the ordinance misidentification prior to trial; and (5) grant such other relief as this Court deems just and proper.

Respectfully submitted,



Heather Dawn Chandler, Pro Se Defendant

406 W Ash

Duncan, Oklahoma 73533

(572) 241-3063

CERTIFICATE OF SERVICE

I hereby certify that on the 8 day of June, 2026, a true and correct copy of the foregoing was delivered to the Stephens County District Attorney's Office, 101 S 11th St, Duncan, Oklahoma 73533.



Heather Dawn Chandler