

CAUSE NO. []

IN THE STATE OF TEXAS

§ IN THE DISTRICT COURT

V.

§ [] JUDICIAL DISTRICT

[]

§ [] COUNTY, TEXAS

EX PARTE MOTION FOR APPOINTMENT OF INVESTIGATOR

NOTICE TO CLERK OF COURT:

This motion is to be considered EX PARTE and is filed for purposes of the record. This motion is required to be SEALED, by law, and disclosure shall be made ONLY to the TRIAL COURT and COUNSEL FOR DEFENDANT.

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW [], the Defendant in the above styled and numbered cause, by and through Court-Appointed Attorney, [], and moves the court to appoint an investigator to assist counsel in this case and for cause would show the court as follows:

I.

The Defendant, [], is charged by indictment/information with the offense of []

The Defendant is unable to pay an attorney to represent him/her in this case.

II.

The court has appointed the undersigned counsel to represent the Defendant in this case. The Defendant also requests that the court appoint Ashley Napariu, Texas DPS-Texas Private Security Bureau License #: A30888001, 711 N Carancahua St., Suite 1420, Corpus Christi, Texas 78401, 361-676-5356, as investigator in this case and to assist defense counsel in representing the Defendant. Tex. Code Crim. Proc. art. 26.05; Ake v. Oklahoma, 470 U.S. 68 (1985); Tex. Const. art. I, § 10, 19.

WHEREFORE, PREMISES CONSIDERED, the Defendant prays that this court appoint an investigator and authorize the payment of reasonable fees and expenses for investigation relating to his/her case. Amount Requested: \$ []

Respectfully submitted,

[]

Attorney for Defendant

State Bar No.: []

Address: []

Phone: [] Email: []

Date: []