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State of Georgia, County of Floyd

STATE OF GEORGIA

FLOYD COUNTY, GA.
CRIMINAL DIV.
Plaintiff(s)

Case Number

'01 JUN 13 PM 1 5701CR16707

Vs.

WATKINS, JOSEPH SAMUEL

FILED
[Handwritten Signature]
[Handwritten Signature]

Certificate Of Service

To: Abernathy, Rex B.
P.O. Box 370
Summerville, GA 30747

Certificate of Service

I hereby certify that I have hand delivered/mailed by first class mailing the following documents.

- Copy of Accusation/Indictment
- Copy of Witness List
- Copy of Demand Rec Disc
- Copy of State's Rec
- Copy of Def's Statement
- Miranda Waiver
- Medical Report
- Supplement
- Notice of intent to raise similar transactions
- Marijuana Test
- Copy of Crime Lab Rpt#
- Copy of Statement Labled
- Copy of Intoximeter Rpt
- Police/Incident Rpt
- Summary
- Phy Eval
- Fact Sheet

This June 13, 2001

[Handwritten Signature]
Assistant District Attorney
Rome Judicial Circuit
State Bar No: 179305

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IN THE SUPERIOR COURT
FOR THE COUNTY OF FLOYD
STATE OF GEORGIA
CRIMINAL DIV.

The State of Georgia, '01 JUN 13 /PM 1 58

vs.

Joseph S. Watkins,
Defendant.

FILED Criminal File Action
No. 01-CR-16707-2
[Handwritten signature]

NOTICE OF INTENT TO RAISE SIMILAR TRANSACTIONS

Comes now the State of Georgia, by and through Tami Colston, District Attorney and pursuant to Rule 31.3 of the uniform Superior Court Rules, and notifies the defendant in the above styled case of the State's intention of raising similar transactions in the trial of defendant's case. The specific incidents the state intends to introduce are as follows:

1.

During the time period between June of 1999 and January 2000, the victim, Isaac Dawkins was harassed by the defendant Joey Watkins on numerous occasions. This forms the basis for the charge of stalking contained in the indictment.

Mr. Watkins threatened Isaac Dawkins and told others he was going to get him. Although these incidents are evidence of "prior difficulties" and are evidence of the crime of Stalking, and are not "similar transactions", the state places defendant on notice that it intends to introduce all prior threats by Joey Watkins against Isaac Dawkins as well as specific incidents where Joey Watkins attacked Isaac Dawkins or chased him with a vehicle. Some of the specific Acts are as follows:

- a. Between June of 1999 and August 1999 Isaac Dawkins' dog was shot between the eyes while in its pen at the Dawkins home. The dog was shot with a .22 cal. Weapon. The victim's dog was shot because Isaac Dawkins was dating Brianne Scarborough.

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- b. Between June of 1999 and January of 2000 Joey Watkins was in his vehicle and was harassing Brianne Scarborough who was in a vehicle with others in downtown Rome. Isaac saw the harassment and approached Joey Watkins. Joey Watkins told Isaac Dawkins to come to his house. Isaac did. Joey Watkins went to the window of Isaac's vehicle and started hitting him through the window.
- c. During the same period of time, Adam Elrod, Travis Camp and Joey Watkins were on Hwy 27 north of Mt. Berry Square Mall during the time Isaac was dating Brianne. Isaac was with Jay Barnett in a white truck. Joey Watkins saw Isaac Dawkins and chased Isaac down the road. Isaac got away from Joey on this occasion.
- d. In the Summer of 1999 Adam Elrod, Joey Watkins, Clay Burkhalter and D.J. Gammon were together on Hwy 140. Isaac Dawkins came by with Paul Allen. Joey Watkins again chased Isaac Dawkins down. The police stopped the vehicle Joey Watkins was in and arrested several of the people inside for underage possession of alcohol.
- e. During the spring or summer of 1999, Joey Watkins saw Isaac Dawkins truck at Brianne Scarborough's house one evening and shot at Isaac Dawkins' truck.
- f. In September of 1999 Joey Watkins chased Isaac Dawkins up Hwy 27 North. He tried to run Isaac Dawkins off the road because Isaac was dating Brianne Scarborough.

Witnesses to these incidents:

Brianne Scarborough
Chad Redden
Adam Elrod
Jay Barnett
Clay Burkhalter
Paul Allen
Josh Flemister
Mark Free
Billy Pasley
Joey Samples
Samantha Dawkins
Paul Cooley

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X

On August 25, 2000 in the evening hours, Joey Watkins positioned his fingers like a gun and pointed it at Ronald Vines. Joey was with five or more other men. Joey Watkins made a shooting gesture and said he was going to kill him that night when he got home. 911 was called. Joey was mad at Ronald Vines over Ronald being with a woman that Joey was jealous of.

Witnesses:

**Ronald Vines
Dustin Pate**

X³

In January or February of 2000, Joey Watkins and Mark Free pulled Mark Kents and Ronald Vines over in their car on Dean Street in Rome, Ga. When Mr. Vines and Mr. Kents stopped, Joey Watkins and Mark Free jumped out of their car with a shotgun and pointed it at Mr. Vines and Mr. Kents. This argument was over a female.

Witnesses:

**Ronald Vines
Marcus Kent**

4.

In late 1998 or early 1999 Jeremy Shuler was dating Brianne Scarborough. Jeremy Shuler exited his car in front of Buffalos Restaurant in Rome, Georgia and Joey Watkins pulled up. Joey Watkins threatened Jeremy Shuler with a knife for dating Brianne.

Witnesses:

**Jeremy Shuler
Brianne Scarborough
Adam Elrod**

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Paul Allen

5.

On Christmas Eve of 1999, Chad Redden was at Mt. Berry Square Mall with Brianne Scarborough. Chad and Brianne were dating. Joey Watkins tried to get Chad Redden to fight him because he was dating Brianne. Brianne Scarborough tried to intervene and Joey Watkins punched her in the ribs. 7

Witnesses:

Brianne Scarborough

Chad Redden

Chad Williamson *incl D State*

6.

In Early 1999 or late 1998 Joey Watkins pulled a gun on Delane Roach because Delane had a date with Brianne Scarborough. Joey Watkins saw Delane Roach and Brianne Scarborough at the movies at Mt. Berry Square Mall and he laid a 30-06 rifle across the hood of his vehicle and threatened to kill Delane. 7

Witnesses:

Chad Redden

Adam Elrod

Delane Roach

Brianne Scarborough

~~7.~~

In 1996 Paul Allen and Will Ware were walking up Parkwood Circle near where Joey Watkins lived with his family. Joey came out of the carport of his home with a rifle and shot at them.

Witnesses:

Will Ware

Paul Allen

~~8.~~

In late 1997 Paul Allen and Delane Roach were together. Delane Roach had been in an argument with Joey Watkins over the phone and Joey told him to come to the house. Upon arrival at Joey Watkins house, Delane

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Roach and Paul Allen got out of the car and were met with four shots from the carport. Joey Watkins told Adam Elrod that he pulled a gun on Delane Roach at his house.

Witnesses:

Delane Roach
Paul Allen
Adam Elrod

9.

Paul Allen dated Brianne Scarborough at one time and during the time that they dated, Joey Watkins continually threatened him.

Witnesses:

Brianne Scarborough
Paul Allen

10.

On March 29, 2000 Joey Watkins and Tim Hughes chased Chad Redden as Chad was on the way to Brianne Scarborough's grandmother's house. They swerved at him and screamed. When Chad left Brianne's grandmother's home, Joey Watkins and Tim Hughes pulled up next to him on Hwy 27 North and said that they would get him and he would end up just like Isaac Dawkins. Chad Redden was dating Brianne Scarborough.

Witnesses:

Chad Redden

11.

Brianne Scarborough will testify to the harassment she has received for dating Isaac Dawkins and other boys as well as the fact that Joey Watkins has threatened every one she has ever dated. Two of the people he has threatened that are not otherwise discussed in this notice are Billy Pasley and Adam Elrod.

While dating Joey Watkins, Brianne Scarborough was going out one night without him. He became enraged and put a gun to her head and threatened to kill her.

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Witnesses:

**Brianne Scarborough
Billy Pasley
Adam Elrod**

12.

Around September of 1999, Joey Watkins started dating Aislynn Hogue. After breaking up, Joey Watkins followed her in his car in Cedartown one night and tried to pick a fight with the boy she was with. She then traded cars with her uncle and Joey Watkins chased Aislynn's uncle in Aislynn's car. Aislynn Hogue took a stalking warrant out for Mr. Watkins.

Witnesses:

**Aislynn Hogue
Jason Cheatwood
Bradley Miller
Ronnie Worthington**

~~13.~~

In 1996 Rick Noah was dating Tandy Watkins, Joey Watkins' sister. Joey got mad at Rick during this time and Joey Watkins attacked Rick Noah at the skating rink on Hwy 53. Shortly after this, Joey Watkins chased Rick Noah's 68 year old grandmother down the road after she picked Rick up from school.

Witnesses:

**Rick Noah
Wanda Noah**

14.

At the time of his arrest, Joey Watkins was dating Kelly Robinson. While incarcerated, Mr. Watkins found out that Kelly Robinson had a date with another man. Joey Watkins became enraged and struck the wall with his fist and said that "when I get out, I will be right back in for killing that guy."

Witnesses:

**Paul Cooley
Jimmy Jacks**

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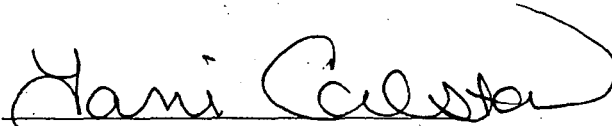
15.

In the case presently before the Court. Defendant is charged with chasing Isaac Dawkins down, stalking him and shooting him in his vehicle on Hwy 27 South. The evidence at trial will show that Mr. Watkins' motive was because Isaac Dawkins was dating Brianne Scarborough.

In the similar transactions sought to be introduced, Mr. Watkins showed violent tendencies toward others whom dated or he thought were dating women that he was interested in. The transactions sought to be introduced show intent, motive and a course of conduct on the part of the accused. The similar transaction evidence also shows an absence of accident and identity.

WHEREFORE the State prays that evidence of similar transactions be allowed into the trial of the present case.

This 13th day of June, 2001



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