



State of North Carolina
General Court of Justice
Prosecutorial District 29A

21 South Main Street
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TED BELL
District Attorney

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July 22, 2015

Mr. Mark Morris, Esq.
Joshua B. Farmer, Esq.
Tomblin, Farmer & Morris, PLLC
187 North Washington Street
Rutherfordton, North Carolina 28139

By Hand Delivery
AT 11:02 AM TO
CALEB FARMER
JFB

RE: State v. Adam Christopher Bartley
Rutherford County File No. 15-CRS-156

Gentlemen:

I am writing to convey a plea offer to your client, Adam Christopher Bartley, in the above-referenced case. The offer is as follows:

The State will dismiss Count I of the Indictment, Second Degree Kidnapping, a Class E Felony and the defendant will plead guilty to Simple Assault, a Class 2 Misdemeanor. The Defendant will provide truthful testimony in the prosecution of the remaining co-defendants, to wit: Brooke McFadden Covington, Sarah Covington Anderson, Robert Louis Walker, Jr., and Justin Brock Covington. In addition, the defendant will cooperate fully with law enforcement in the ongoing investigation into this incident as well as any others which become known during said investigation. The Defendant will receive a suspended sentence with no active period of confinement and will be placed on supervised probation under such additional terms as the court may require.

As I previously informed you, I believe that this offer presents you, your Firm, and your associates, with a non-waivable concurrent conflict of interest and I therefore respectfully request that you withdraw from this representation immediately.

I look forward to your reply.

Sincerely,

Garland F. Byers, Jr.
Garland F. Byers, Jr.
Assistant District Attorney

*Robert Denton discussed this plea
w/ me on 8/13/15. He explained my
choices and I understand the same.
I reject any plea offer as I did
nothing wrong.*

Adam C. Bartley
Adam Bartley
Robert Denton
witness