

Clifton Taylor  
Defendant

No. 09-00043 REL-01

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Motion to Resubmit video as evidence

Jesus once stated render the things to Caesar which belong to Caesar therefore the law provided by the government of a consciousness of guilt shall be returned to the government as goes. The defendant hereby request the court to consider the recently dismissed video of cell phone store as admissible evidence due to the fact that the government did not notice such poor quality of the video until after the defendant raised claims of tampering with evidence, therefore it is by a consciousness of guilt of tampering the government wish to discard the video. *Harris v. United* 2002 WL 37780176 at 4 (SDNY 2002) the Southern District of New York upheld the trial courts logic and the use of evidence of a { change of clothing } prior to { arrest } as evidence of a consciousness of guilt. { dismissal of video } { trial }

U.S. v. Merul 484 F.2d 168, 170 (8th Cir.) 414 U.S. 1077 (1973) false denial of knowledge of the { offense } } was evidence of guilt. { poor quality of video until after complaint of tampering }

*Commonwealth v. Green* 306 Mass 344, 94 NE 2d 260 (1950) false pretenses requires false statement of fact known or believed by the defendant to be false.

Motion under 18 § 2703(d) to court order all original video footage

The defendant request the court to grant all original video footage including the previously dismissed video at the cell phone store to be amended to the defendant's Exhibits List to establish some frame of defendant's entry to store. If the government wrongfully withholds all original videos of cell phone store including the recently dismissed video that Pro-Se defendant could construct defensive investigation the defendant request the court to grant - Motion to Dismiss - U.S. ex rel. *Merrett v. Hicks* 492 F. Supp 98 D.N.J. (1980)