

06-08-2009

Motion 10/2

In the United States District Court for the
Western District of Missouri
Western Division

United States of America
Plaintiff

Case # 09-00112-01-CR-W-ODS
09-00043REL-01

Clifton Taylor D.
Defendant



Motion for Ineffective Assistance

Comes now the Defendant Clifton Taylor D without counsel and not trained in the law hereby moves this court to grant motion in ineffective counsel. In May 2009 I requested to the courts that Public Defender Travis Ponderter be removed from my case because upon request he has refused to file these motions: Extradition Hearing, Jury Minutes, Offer of Proof, Discovery and Suppression of evidence. Travis Ponderter stated several times these motions are not available until after trial in a attempt to deceive me knowing after trial motions will come in the form of appeal. On June 8 2009 Travis denied any knowledge of my appeal to his assistance and pretends to represent my case this is government misconduct entrapment inflicting this Persons Lack of Public Services upon me. On 06-08-09 I asked Travis to challenge the hearsay testimonies which have different stories Travis stated that was not possible over a three way call with Ronald Navarra; federal law is contrary to that statement, [See eg United States v Williams 41 F.3d at 506-02 See United States v Ferguson 246 F.3d 129 (2d cir 2001) United States v Holloway 1 F.3d 307 (5th cir 1997) Cf. 3 Blackstone, commentaries at 373 it is considered a abuse of discretion not to allow a party to challenge the reliability of hearsay evidence] ect. Therefore Travis Ponderter has traveled outside his realm of Public Defense by not being honest with his client, not protecting his clients pretrial rights. Therefore I request the courts to grant motion for ineffective assistance against Travis. ~~Travis Ponderter is not a public defender and is not a lawyer.~~ ~~Travis Ponderter is not a public defender and is not a lawyer.~~ Travis Ponderter's refusal to file pretrial motions will be considered a act of bad faith. Also this motion is not entered Pro Se but from one who is untrained and have no knowledge of the law and request the courts offer new counsel. Also Travis has preserved a new complaint

from Federal investigators which left out elements I have previously filed motions on such as witnesses alleging I ran behind houses and ~~then~~ my appearance changed. Ronald Reinert stated I signed this federal complaint because my name is on a miranda waiver which is a separate issue from the investigators finding. And the courts should offer me new counsel when there is proof of government misconduct by knowingly presenting false representation of material Commonwealth v Green 326 Mass, 344, 94 N.E 2d 216 (1950) Travis is trying to send me to trial without exercising my rights of pretrial motions therefore they will be denied interlocutory review after trial. I asked Travis for a motion of discovery on the witness statements and he gave me hand written statements of his likeness as a discovery. Therefore as the courts stated upon request they will provide pretrial request within ten days therefore I request the courts to grant motion of discovery on all the witness statements and motion for evidentiary hearing See U.S. v Barnett 214 F. Supp. 1449 (D Alaska 1992) W. Prosser + W. Keeton, torts § 105 (5th ed 1984)

Choice of Counsel, Replacement of appointed counsel 11.4(b)
U.S. v. D Amore 56 F 3d 1202 9th Cir 1995

Respectfully Submitted