

Clifton Taylor
Shirley A. Moore
SHIRLEY A. MOORE
Notary Public - State of Kansas
My Appt. Expires 6/11/2012

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08-08-09

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

United States of America)
Plaintiff)
v)
Clifton Taylor)
Defendant)

No. 09-00043 REL-01

Motion: Give notice to Insanity Defense

comes now the Defendant untrained and without knowledge of the law hereby request the courts to acknowledge his plea of insanity due to ineffective counsel. The Defendant states the courts are clearly aware of tensions from four previously filed motions of ineffective counsel also conflict with representation during hearing and hereby alleges Travis Poundexter has destroyed the defendants moral character that he should not preserve the interest and health of those who are not his co workers as Travis Poundexter has religiously displayed by his lack of interest in the Defendants defensive remedies. As a result the defendant will remain incompetent to stand trial under the representation of Travis Poundexter whom the defendant sees as a immediate threat to his existence and state with his susceptibility to entrapment U.S. v Sullivan 919 F.2d 1403 (10th Cir 1990) see U.S. v Weaver 882 F.2d 1128 (7th Cir 1989) also failure to challenge probable cause Joshua v Dewitt 341 F.3d 430 (6th Cir 2003) Counsel's failure to argue government misconduct Washington v Hofbauer 228 F.3d 689 (6th Cir 2000) actual conflict of interest Mickens v Taylor 535 U.S. 162, 172 n (2002)

according to law these motions have been forwarded to Travis Poundexter for filing

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Motion for disclosure of Documents per 16(a)(1)(C) as follows

(Brady)

Comes now the Defendant untrained and without knowledge of the law hereby request of the courts disclosure of all line up photos, surveillance photographic reports of bank robbery suspect whom died in bank robbery of the Central Bank immediately following the defendants arrest for comparison to those in defendants case. U.S. v. Taylor 707 F Supp 696:705 (S.D.N.Y. 1989) also handwriting and voice and finger prints comparisons.

Motion: Disclose results of Test under 16 (a)(1)(D)

(Brady)

Comes now the Defendant untrained and without knowledge of the law hereby request the courts to grant motion to disclose results of all lab test U.S. v Taylor 707 F Supp 696 (S.D.N.Y. 1989). The defendant request results of comparisons of handwriting, hair, fingerprints, voice, saliva, ect also samples on which the defence can conduct independent test U.S. v Noel 708 F Supp 177 (W.D. Tenn. 1989) also the defendant request expert qualifications and disclosure of opinion per Rule 16 (a)(1)(E)

Motion: Disclose Electronic Surveillance warrant per 18[§] 2703(D) (Brady)

Comes now the Defendant untrained and without knowledge of the law hereby request this court to grant request to disclose any and all material concerning the subpoena or court order authorization for electronic records seizure in compliance with all technical aspects of Title III tape sealing requirement U.S. v Ortega-Rios 495 U.S. 257 (1990) also the defendant request expert qualifications per Rule 16 (a)(1)(E)

Motion to disclose Personal File

(Brady)

Comes now the Defendant untrained and without knowledge of the law hereby request the courts to grant motion to disclose FBI agent Michael G MRachek personal files for past instances of dishonesty or misconduct. U.S v Garrett 542 F 2d 23 (6th cir 1976) U.S v Deutsch 475 F 2d 55 (5th cir 1973)