

STATE OF MAINE
YORK, SS.

UNIFIED CRIMINAL DOCKET
LOCATION: ALFRED
DOCKET NO. YRKCD-CR-2021-0016

STATE OF MAINE,)	
Plaintiff)	
)	
)	
v.)	MR. CARLSON'S MOTION TO SUPPRESS
)	
)	
STEPHEN W. CARLSON,)	
Defendant)	

NOW COMES Stephen Carlson, by and through his attorney, David J. Bobrow,
with this Motion to Suppress particularly stated as follows:

BACKGROUND

This matter is currently before the Court on the Government's four-count
Complaint including charges of Aggravated Reckless Conduct, Class B, Domestic
Violence Reckless Conduct with a Dangerous Weapon, Class C,¹ Discharge of a
Firearm Near School Property, Class E, and Discharging a Firearm Near a Dwelling,
Class E.

On or about 1:10 P.M. on January 11, 2021, Officer Brian Delaney and Sargent

¹ This charge is in the current complaint but it is believed that the Government will not be pursuing this count. It is noteworthy that Officer Delaney specifically informs Mr. Carlson that such a charge won't happen.

Ronald Lund responded to a report of gun shots in the vicinity of 177 Mosses Gerrish Farmer Road in Kittery, Maine. The Officers walked up stairs and Sgt. Lund knocked on a window, announcing their presence, and Officer Delaney knocked on the wall. They made contact with a female, later identified as Mr. Carlson's wife, and Mr. Carlson who was directed to enter the porch to speak to them. Mr. Carlson was subsequently placed in handcuffs. The Officers did not read Miranda warnings and Mr. Carlson was subjected to an interrogation. He was brought to the police station where Officer Delaney read Miranda Warnings. He was subjected to a further interrogation and booked. Mr. Carlson was subsequently transported to Southern Maine Medical Center due to the Officers' concerns for Mr. Carlson's mental condition. Mr. Carlson did make numerous suicidal statements. He was later transported to the York County Jail.

ISSUES PRESENTED:

- 1) Did the officers have a basis to seize Mr. Carlson?
- 2) Did the officers engage in an 'illegal' arrest of Mr. Carlson?
- 3) Were Mr. Carlson's initial statements the product of a Unmirandized custodial interrogation?
- 4) Were Mr. Carlson's initial statements voluntary?
- 5) Did subsequent Miranda warnings alleviate the earlier Constitutional violations?
- 6) Was evidence obtained following the arrest 'fruit of the poisonous tree'?
- 7) Were Mr. Carlson's subsequent statements after Miranda voluntary?

STATEMENT OF UNCONTESTED FACTS²

- 1) On or about 1:10 P.M. on January 11, 2021, Officer Brian Delaney and Sargent Ronald Lund responded to a report of gun shots in the vicinity of 177 Mosses Gerrish Farmer Road in Kittery, Maine. *Report of Patrolman Brian Delaney (hereafter 'Delaney Report')*.
- 2) Based on discussions with individuals in the area, Sgt. Lund believed the gunshots were from the residence above 'The Eliot Meet Market.' *Report of Sargent Ronald Lund (hereafter 'Lund Report')*.
- 3) The Officers approached the apartment and did not observe anything unusual. *Delaney Report*.
- 4) They went up the stairs and knocked on the door, not receiving a response. Sgt. Lund then knocked on the window, announcing their presence, and Officer Delaney knocked on the wall. *Id.*
- 5) Sgt. Lund remarked "I'm going in now" and attempted to open the door. This assertion was followed up with "maybe not, it's locked." *Video of Officer Delaney (hereafter 'Delaney Video')*.
- 6) The officers continued knocking at the windows and yelled "come on out, police." *Id.*
- 7) After that, a female, later identified as Stephanie Gaskell, exited the property

² The facts provided are taken from discovery provided by the Government and citations are therefore made to the various reports and recordings by title.

- into a porch area. *Id.*
- 8) Sgt. Lund then entered a porch and yelled “Stephen are you in there, come on out here.” He repeated this twice. *Id.*
- 9) Stephen exited the interior of the apartment to the porch with his hands raised. Upon the direction of Sgt. Lund, he raised his shirt and denied having any weapons. *Id.*
- 10) He was directed to sit by Sgt. Lund which he complied, then stood and raised his shirt again. *Id.*
- 11) The officers performed a brief pat down, then placed Stephen in handcuffs. *Id.*
- 12) At no time were Miranda warnings read to Mr. Carlson until he was brought to the police station. *Id.*
- 13) Officer Delaney then proceeded to question Mr. Carlson inquiring about what happened and what kind of gun was used. *Id.*
- 14) Based on what Mr. Carlson stated, the officers conducted a search in the back yard where they found bullet casings. They also found a television set with bullet holes in the residence. *Id.*
- 15) The officers later discussed whether it would be wise to put Mr. Carlson in jail before bringing him to the police station. *Id.*
- 16) At the police station, Officer Delaney read Mr. Carlson Miranda Warnings. *Delaney Video (2).*
- 17) While at the police station, Mr. Carlson made statements threatening self-harm. *Id.; Delaney Report.*

18)Mr. Carlson was later shackled at the police station and brought to the hospital.

Id.; *Delaney Video* (3)

19)During the examination at the hospital, Mr. Carlson made further statements about having nothing to live for and not having the balls to do it, and requested that the officer shoot him in the face. *Id.*

20)Mr. Carlson was brought from the hospital to the jail where he was processed and booked. *Id.*

ARGUMENT

I. MR. CARLSON WAS SEIZED FROM THE MOMENT THE OFFICERS DIRECTED HIM TO EXIT HIS RESIDENCE INTO THE CURTILAGE OF HIS HOME

When an officer does not apply physical force to restrain a suspect, a Fourth Amendment seizure occurs when (a) the officer shows his authority; and (b) the citizen "submit[s] to the assertion of authority." *See California v. Hodari D.*, 499 U.S. 621, 625-26, 111 S.Ct. 1547(1991). Seizure of a suspect requires reasonable suspicion to believe the actor has engaged in criminal activity. *Id.* at 626. *See* also *State v. Patterson*, 868 A.2d 188 (Me.2005)(a seizure occurred when an officer tapped on a window and asked the occupant to 'please roll down your window').

A. Mr. Carlson has standing to raise issues of Constitutional dimension

Whether a defendant has a reasonable expectation of privacy in a particular place is a two-pronged inquiry. The issue is whether the movant has exhibited an actual, subjective, expectation of privacy; and second, whether such subjective expectation is one that society is prepared to recognize as objectively reasonable. *United States v. Rheault*, 561 F.3d 55, 59 (1st Cir. 2009). The inquiry takes “into consideration the nature of the searched location,” and prior decisions for guidance. *Id.*; see also *United States v. Beaudoin*, 362 F.3d 60, 70 (1st Cir. 2004). It is unquestioned that Mr. Carlson was a resident at the home located at 177 Moses Gerrish Farmer Road, Apt. 3A in Kittery, Maine. As the resident of a dwelling that is “akin to a traditional home,” he possessed a reasonable expectation of privacy throughout the interior and curtilage of the premises. See *Payton v. New York*, 445 U.S. 573, 590, 100 S.Ct. 1371 (“the Fourth Amendment has drawn a firm line at the entrance to the house.”); *United States v. Weidul*, 325 F.3d 50, 52 fn. 1 (1st Cir. 2003) (noting that a defendant who was “staying or living” with a friend had an expectation of privacy in the friend's home). Therefore, Mr. Carlson has standing to raise challenges as to the officers’ presence at 177 Moses Gerrish Farmer Road, Apt. 3A and all evidenced obtained after the illegal entry.

B. Mr. Carlson was subjected to an interrogation by the officers

“Interrogation,” for Fifth Amendment purposes under *Miranda*, is defined as “not only express questioning, but also ... any words or actions on the part of the police (other than those normally attendant to arrest and custody) that the police should know are reasonably likely to elicit an incriminating response from the suspect.” *Rhode Island v. Innis*, 446 U.S. 291, 301 (1980). “An incriminating response is any response - whether inculpatory or exculpatory - that the prosecution may seek to introduce at trial.” *Id.* at 301 fn.5. The Officers knew that the questioning of Mr. Carlson was designed to elicit incriminating statements, therefore Mr. Carlson was subjected to an interrogation.

C. Even if Stephen Carlson was not seized, he was impermissibly approached at his home in the absence of a warrant.

Even if a seizure did not occur, Mr. Carlson was impermissibly approached in his home on January 11, 2021 in the absence of a warrant. When it comes to the Fourth Amendment, the home is first among equals. *Florida v. Jardines*, 569 U.S. 1 (2013). At the Amendment's “very core” stands “the right of a man to retreat into his own home and there be free from unreasonable governmental intrusion.” *Id.* citing *Silverman v. United States*, 365 U.S. 505, 511, 81 S.Ct. 679, 5 L.Ed.2d 734 (1961). This right would be of little practical value if the State's agents could stand in a home's porch or side garden and trawl for evidence with impunity; the right to retreat would be significantly diminished if

the police could enter a man's property to observe his repose from just outside the front window. *Id.*

1. Mr. Carlson did not provide consent to the entry of the residence

Consent is a “jealously and carefully drawn exception” to “the Fourth Amendment rule ordinarily prohibiting the warrantless entry of a person's house as unreasonable per se.” *Georgia v. Randolph*, 547 U.S. 103, 109, 126 S.Ct. 1515, 1520, 164 L.Ed.2d 208, 218-19 (2006). The government has the burden of proving, by a preponderance of evidence, that the consent was, in fact, freely and voluntarily given. *Schneckloth v. Bustamonte*, 412 U.S. 218, 222 (1973).

One of the key factors that courts consider when assessing the voluntariness of a consent is whether a defendant had been given a *Miranda* warning and therefore knew he had a right to refuse to answer questions. *Id.* at 227. In this matter, no warrant was obtained and the *Miranda* warnings occurred long after Mr. Carlson made incriminating statements. If consent was not valid, then any subsequent evidence obtained would be ‘fruit of the poisonous tree’ and must be suppressed. *Brown v. Illinois*, 422 U.S. 590, 602-03, 45 L. Ed. 2d 416, 95 S. Ct. 2254 (1975).

II. **THERE WAS NOT A BASIS TO ENGAGE IN A PHYSICAL SEIZURE OF MR. CARLSON, THEREFORE ALL EVIDENCE OBTAINED AFTER THAT SEIZURE SHOULD BE SUPPRESSED**

Whether reasonable suspicion exists to support a seizure depends upon the totality of the facts and circumstances in any given case. *People v. McCrimmon*, 37 Ill.2d 40, 224 N.E.2d 822, 824 (1967). The question as to what particular information will suffice to establish suspicion will turn on the facts and circumstances of each case. *People v. Thornton*, 47 Ill.App.3d 604, 7 Ill.Dec. 721, 365 N.E.2d 6, 10 (1977); *State v. Curtis*, 217 Kan. 717, 538 P.2d 1383, 1389 (1975); *State v. Bean*, 280 Minn. 35, 157 N.W.2d 736, 740 (1968), cert. denied, 393 U.S. 1003, 89 S.Ct. 493, 21 L.Ed.2d 468. For an officer to make a constitutionally sound seizure there must be an “articulable suspicion that criminal conduct has taken place, is occurring, or imminently will occur, and the officer’s assessment of the existence of specific and articulable facts sufficient to warrant the action. *State v. Tarvers*, 709 A.2d 726, 727 (Me.1998). “The reasonableness of the official suspicion must be measured by what the officers knew before they acted. *Florida v. J.L.* 529 U.S. 266, 271 (2000).

The basis to seize and search an individual is to be evaluated and judged on the the collective information in possession of the police at the time of arrest, as the knowledge of each officer working in coordination in an attempt to solve a reported crime is the knowledge of all. *State v. Smith*, 277 A.2d 481, 488-489 (Me. 1971). If the arresting officers, however, are acting on information conveyed by police transmission facilities, which by itself would not be sufficient to establish probable cause to justify the arrest,

then the arrest without a warrant would be illegal, unless the State produced the evidence within the knowledge of the other members of the police team on which the radio information was based and which itself singly or in conjunction with the evidence independently gathered by the arresting officers constituted probable cause. *United States v. Vasquez*, 534 F.2d 1142, 1145 (5th Cir. 1976); *Collins v. State*, 17 Md.App. 376, 302 A.2d 693, 697 (1973). In this matter, the Officers had no independent knowledge of illegal activity that justified seizing Mr. Carlson.

A. There Was No Other Evidence that Allowed for Mr. Carlson to be Seized

When the officers encountered Mr. Carlson, he did not display any actions that would justify an officer believing there was an apparent safety issue. In *Sibron v. United States*, the Court explicitly stated that a pat-down was not appropriate where “the officer was not acquainted with Sibron, and had no information concerning him. He merely saw Sibron talking to a number of known narcotics addicts over a period of eight hours. It must be emphasized that Patrolman Martin was completely ignorant regarding the content of these conversations, and that he saw nothing pass between Sibron and the addicts.” 392 U.S. 40, 62 (1968). In this case, similarly, the officers were not directly acquainted with Mr. Carlson and they had no considerable first-hand information concerning his alleged activity in criminal endeavors.

The sole basis for permitting a frisk is a justifiable suspicion that the person to be frisked is armed and poses an immediate danger to police safety or community safety.

There must be *particularized facts* to support a reasonable conclusion that “the person with whom the police officer is dealing may be armed and presently dangerous.” *Terry v. Ohio*, 392 U.S. 1, 27(1968) (emphasis added). There are no particularized facts to support the reasonable conclusion that Mr. Carlson was armed or was presently dangerous. As such, the subsequent frisk, and arrest was unlawful and all evidence obtained after the impropriety should be suppressed. *Wong Sun v. United States*, 371 U.S. 471 (1973).

III. MR. CARLSON WAS IN CUSTODY FROM THE TIME THE OFFICERS PLACED HIM IN HANDCUFFS

As discussed *supra*, when the officers initiated contact with Mr. Carlson, it was clear could not leave the situation. See *Howard v. State*, 44 Ala. App. 595, 217 So. 2d 548 (1969)(court noted it would be naive to believe that the defendant could have freely walked away from the interview). While it is clear that Mr. Carlson was seized from the time the officers came him specific directives, it is inarguable that he was in custody after he was placed in handcuffs. See *State of Maine v. King*, 2016 ME 54. A statement “made by a person subjected to custodial interrogation who is not first given Miranda warnings is inadmissible against that person [in the State’s case-in-chief] at trial.” *State v. Kittredge*, 2014_ME_90 ¶ 16, 97 A.3d 106. The proper remedy for failing to provide proper Miranda warnings to a Defendant is suppressing the evidence obtained during and after the interrogation. *Id.*

IV. THE MIRANDA WARNINGS AT THE POLICE STATION DID NOT ALLEVIATE THE CONSTITUTIONAL VIOLATION

After Mr. Carlson was transported to the police station, there is a brief discussion with the officer before he is read Miranda warnings. *Facts* at 12, 16. In *State v. Philbrick*, the Law Court held that Miranda warnings are not, as a general rule, sufficient to cure the taint of an initial unwarned statement because an inculpatory statement obtained in violation of a suspect's Miranda rights taints a subsequent post-Miranda confession. 436 A.2d 844, 852 (Me.1981). The rationale was that an accused's subsequent statements, even if made under proper Miranda warnings, must be viewed as given under the psychological pressures of having already made those incriminating statements and must be considered as the fruit of the first unlawful interrogation. *Id.*

In *State v. Pinkham*, the Law Court clarified this black letter ruling holding that the trial court *could consider* whether the defendant intelligently waived his rights under Miranda, and if his post-Miranda statements were also voluntarily made. 510 A.2d 520, 522-23 (Me.1986)(emphasis added). In determining the admissibility of post-Miranda statements when those statements have been preceded by unwarned statements, a trial court has to address several separate, although interrelated, issues. The court must review the circumstances of the Miranda warnings and decide if the State has demonstrated by a preponderance of the evidence that the Miranda rights were properly read to the suspect whether the suspect knowingly, intelligently and voluntarily waived those rights. *United States v. Olsen*, 609 F.Supp. 1154, 1160-61 (D.C.Me.1985); *State v. DeLong*, 505 A.2d 803, 808 (Me.1986). The court also has to determine whether the initial unwarned, and

thus inadmissible, statements were voluntary, and should address, among other factors, whether "coercive or improper tactics" were used in obtaining them. *Elstad v. Oregon*, 470 U.S. 298, 314 (1985). The court should "examine the surrounding circumstances and the entire course of police conduct with respect to the suspect in evaluating the voluntariness of his statements." *Id.* at 318. In this matter, Mr. Carlson was clearly repeating the prior statements he made when he was interrogated and Unmirandized. Additionally, it is not clear that he understood all of this rights as his thoughts during the recitation are disjointed. Finally, the Government cannot show the voluntariness of his statements beyond a reasonable doubt based upon his intoxication and mental condition. See Section VI, *supra*.

V. THE SUBSEQUENT SEIZURE OF EVIDENCE WAS BASED ON THE ILLEGAL ARREST, THEREFORE ALL EVIDENCE OBTAINED SHOULD BE SUPPRESSED

When contraband is seized by officers who do not possess a warrant, the Government "bears the burden of proving the existence of an exception to the Fourth Amendment's warrant requirement." *United States v. Ramos-Morales*, 981 F.2d 625, 628 (1st Cir. 1992). As a general rule, the warrantless seizure of personal property is *per se* unreasonable under the fourth amendment. *United States v. Place*, 462 U.S. 696, 701, 103 S.Ct. 2637, 2641, 77 L.Ed.2d 110 (1983). Even where a search is deemed unlawful, the fruits of the search are not automatically subject to suppression. *Brown v. Illinois*, 422 U.S. 509, 599-600 (1975); *Utah v. Strieff*, 136 S. Ct. 2056, 2061 (2016); *State v. Bailey*,

2012 ME 55, ¶ 16, 41 A.3d 535. “[T]o determine whether the constitutional violation and evidence subsequently obtained after a consent have a strong enough connection to classify the evidence as fruit of the poisonous tree[,]” the court must consider five factors: (1) the voluntariness of the consent; (2) the proximity in time between the constitutional violation and the discovery of the evidence; (3) whether intervening circumstances were present; (4) the purpose and flagrancy of police misconduct; and (5) whether the police complied with Miranda *Id.* ¶ 21 citing *Brown*, 422 U.S. at 603-04; *State v. Boyington*, 1998 ME 163, ¶ 10, 714 A.2d 141). The factors apply to confessions as well as non-testimonial evidence. *State v. LeGassey*, 456 A.2d 366, 368 (Me. 1983). In this matter, all factors point to the exclusion of the bullet casings and the television. There was no consent to obtain or search for those items; the search occurred shortly after Mr. Carlson was handcuffed and placed in custody; there were no intervening circumstances; the police failed to obtain a search warrant despite having time to do so and no exigent circumstances existing; and Miranda warnings were not read. Thus, all evidence obtained was unlawful and should be suppressed. *Wong Sun*, 371 U.S. at 471.

VI. MR. CARLSON’S STATEMENTS WERE SUCH THAT THEY WERE NOT OF HIS FREE WILL AND RATIONAL INTELLECT AND THUS, WERE NOT VOLUNTARY AND ACCORDINGLY, SHOULD BE SUPPRESSED

A confession is admissible in evidence only if voluntary, and the State bears the burden of establishing voluntariness beyond a reasonable doubt. *State v. Coombs*, 704

A.2d 387, 390 (Me.1998). In order to find a statement voluntary, it must first be established that it is the result of defendant's exercise of his own free will and rational intellect. *State v. Rees*, 748 A.2d 976 (Me.2000). The voluntariness requirement protects against objectionable police practices, protects the mental freedom of the individual, and preserves the quality of fundamental fairness in the criminal justice system. *State v. Mikulewicz*, 462 A.2d 497, 500 (Me.1983). Factors that the Court considers in determining voluntariness are: "details of the interrogation, duration of the interrogation, location of the interrogation, whether the interrogation was custodial, recitation of the Miranda warnings, number of officers involved, persistence of the officers, police trickery, threats, promises or inducements made to the defendant, the defendant's age, physical and mental health, emotional stability, and conduct." *Rees* at 977. If the statements were not voluntary, and were not the result of free will and rational intellect, then use of the statements at trial would potentially violate {Mr. Carlson's} rights under the Fifth and Fourteenth Amendments of the United States Constitution and Art. I, Section 6 of the Constitution of Maine. *State v. Edwards*, Cumberland Sup. Court, *J. Studstrup*, May 4, 2007. The Maine Supreme Court has previously identified three values that are served by the voluntariness requirement: "(1) it discourages objectionable police practices; (2) it protects the mental freedom of the individual; and (3) it preserves a quality of fundamental fairness in the criminal justice system." *State v. Sawyer*, 2001 ME 88, ¶ 8, 772 A.2d 1173, 1176 quoting *State v. Mikulewicz*, 462 A.2d 497, 500 (Me.1983).

A. The Statements at the residence were not voluntary

Under the factors enunciated in *Rees*, the statements at the residence were involuntary. Officers arrived at the scene and started to interrogate Mr. Carlson. *Facts* at 1-10. Any police interrogation that focuses on particular suspects regarding particular events has the potential for creating a “coercive atmosphere.” *State v. Preston*, 411 A.2d 402, 406 (Me.1980). Mr. Carlson concedes that this action, by itself, will not render a statement involuntary. However, it is a factor to consider regarding the involuntariness of the statements. See *State v. Knight*, 482 A.2d 436, 442 fn.4 (Me.1984). When, however, “compulsion of whatever nature or however infused, propels or helps to propel the confession, use of the confession offends due process.” *Culombe v. Connecticut*, 367 U.S. 568, 602, 81 S.Ct. 1860, 6 L.Ed.2d 1037 (1961) quoted by *State v. Caouette*, 446 A.2d at 1123.

Police coercion may be “implied,” “subtle,” and “psychological.” *Moran v. Burbine*, 475 U.S. 412, 426, 106 S.Ct. 1135, 89 L.Ed.2d 410 (1986) (“[T]he Court has recognized that the interrogation process is ‘*inherently coercive*’ and that, as a consequence, there exists a substantial risk that the police will inadvertently traverse the fine line between legitimate efforts to elicit admissions and constitutionally impermissible compulsion.” (*emphasis added*)). The Supreme Court of New Hampshire has similarly recognized the concerns of statements made to law enforcement:

“A confession is a special type of evidence. Its acceptance basically amounts to conviction. Confessions are usually obtained in the psychological atmosphere of police custody and in the greatest secrecy in which the cards can be stacked against

the accused. He has no means of combating the evidence produced by the police save by his own testimony. The stakes are too high and the risk of error too great to permit a determination of admissibility to be decided by a balance of probabilities.” *State v. Phinney*, 117 N.H. 145, 146 (1977).

It is the Government’s burden to prove the voluntariness of Mr. Carlson statements at the residence beyond a reasonable doubt. Because the actors for the Government took advantage of Mr. Carlson’s mental condition, the Government cannot meet that burden. Accordingly, the statements from the accident scene should be suppressed.

B. The statements by Mr. Carlson while at the police station were not voluntary

Similarly, under the *Rees* factors, the statements while at the police station were involuntary. Any police interrogation that focuses on particular suspects regarding particular events has the potential for creating a “coercive atmosphere.” *Preston*, 411 A.2d 402, 406. Both officers had commented on Mr. Carlson’s intoxication and mental condition and he was later transported to the hospital for observation. *Facts* at 15, 18-20. In *State v. Durepo*, the Defendant, who was mentally ill, went to the Sanford police station voluntarily, while sober and in apparent good health, and was apprised of, understood, and effectively waived his Miranda rights prior to questioning. 472 A.2d 919 (Me. 1984). The Court found that the statements made under those circumstances were voluntary. *Id.* In this matter, however, Mr. Carlson was not in good physical and mental health. *Facts, generally*. The officers took advantage of Mr. Carlson’s medical situation.

An officer may not take advantage of one's medical condition in order to elicit incriminating statements. *State v. Bowshier*, 1992 WL 288780 (Ohio Ct. App. 2d Dist. Clark County 1992) (unreported opinion); *People v. DeBoer*, 829 P.2d 447 (Colo. Ct. App. 1991).

It is the Government's burden to prove the voluntariness of Mr. Carlson's statements while at the police station beyond a reasonable doubt. Based on intoxication and the state of Mr. Carlson's mental condition, the Government cannot meet that burden. Accordingly, the statements while at the police station should be suppressed.

WHEREFORE, Mr. Carlson respectfully requests that the Court grant this Motion to Suppress or in the alternative set the matter for an evidentiary hearing.

RESPECTFULLY SUBMITTED:
STEPHEN CARLSON

By His Attorney,
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Date:03/30/2021

s/DJB
David J. Bobrow, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this date I mailed, postage paid, a copy of this Motion to Assistant District Attorney Thaddeus West.

Date:03/30/2021

s/DJB
David J. Bobrow, Esq.

