

STATE OF NEW HAMPSHIRE

CHESHIRE, SS

SUPERIOR COURT

Case No. 213-2011-CR-00216

State v.
Jason Talley

**RESPONSE TO THE STATE'S RESPONSE TO THE DEFENDANTS RESPONSE
TO THE STATE'S MOTION TO QUASH SUBPOENAS**

The State of New Hampshire, through its agent Associate Attorney General Richard Head, has filed a response with this honorable Court to Jason Talley's response to the motion to "quash" the subpoenas issued to New Hampshire's two chief trial court judges. Jason Talley responds as follows:

1. Mr. Talley agrees with the State's legal reasoning regarding NH Rule of Professional Conduct 1.7 and withdraws that specific objection.
2. Mr. Talley reiterates and reaffirms his position that Part I, Article 8 of the New Hampshire Constitution permits him to hold judges accountable by deposing and subpoenaing them as witnesses in his trial for deprivation of his constitutional rights when the judges enacted orders do so to cover for another judges criminal conduct.
3. Mr. Talley reiterates and reaffirms his position that the facts of this case, combined Part I, Article 10 of the New Hampshire Constitution, authorize him to reform the New Hampshire Judicial Branch from what it exists as today, into a branch of government accountable to The People and free of criminal behavior.
4. Mr. Talley believes that he "*of right ought to reform*" the New Hampshire Judicial Branch as "*public liberty is manifestly endangered*" when a judge can mislead

law enforcement officers by illegally ordering a citizens imprisonment on video and not be held accountable by his superiors within the New Hampshire Judicial Branch.

5. Mr. Talley believes requiring that sitting judges actually be held accountable for their public acts which could be criminal in nature that restricted his Part I, Article 22 and 1st Amendment rights, by means of being subject to all the things normal citizens are, would be sufficient reform in his present case.

Prayer for Relief

WHEREFORE, Jason Talley, requests this honorable Court to order the following relief:

- A. Deny the state's "Motion To Quash" without a hearing, or
- B. Schedule a hearing regarding the state's "Motion To Quash", and
- C. Authorize the transfer of the question of whether or not judicial officers can be questioned by a criminal defendant for a potential jury nullification defense when an abuse of the public trust is alleged by those same officers and those same officers have found themselves subject to an official criminal investigation, to the New Hampshire Supreme Court pursuant to New Hampshire Superior Court Rule 79; and
- D. Grant any other relief this honorable Court deems just and proper.

Respectfully submitted,
Jason Talley

03/23/12

By
Bradley Jardis
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I hereby certify that on the above date, a copy of this motion was mailed to both

New Hampshire Associate Attorney General Richard Head and Assistant Cheshire County Attorney John Webb.

Bradley Jardis