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| **Motion to Dismiss / Strike** | Ian Freeman63 Emerald St. #610 Keene, New Hampshire |

**May 21, 2013**

Court Name: Keene District

Case Name: State v. Ian Freeman f/k/a Ian Bernard

Case Number: 449-2013-CR-00206

Now comes Ian Freeman of the Shire Society, called defendant by this court, reserving all rights, by special appearance, not submitting to the court’s jurisdiction, who motions this court as follows:

Defendant is grateful that the court made the right choice in its recent order from June 4th 2013 where the court vacated the portion of the administrative inspection warrant regarding the fire inspection and subsequently suppressed the evidence gathered by fire Gary LaFreniere chief during the raid.

With this decision in mind, defendant would like to remind the court that the COMPLAINT in this case was originally filed by fire chief LaFreniere and therefore should be stricken. There are no other matters in front of this court. Given the evidence LaFreniere collected has been suppressed, that would include the COMPLAINT either directly or via the “fruit of the poisoned tree” doctrine.

Defendant recommends the court strike the complaint and dismiss the case with prejudice as well as grant whatever further relief it deems proper.

Hand-delivered this \_\_\_\_ day of **June 2013**.

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Ian Freeman

Certificate of service

This is to certify that a true and correct copy of the foregoing has been hand-delivered this

\_\_\_ day of **June 2013** to the alleged plaintiff.

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Ian Freeman

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