

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS

6th CIRCUIT – DISTRICT DIVISION
HILLSBOROUGH

The State of New Hampshire

Case No. 444-2024-CR-00109

v.

Joseph Hart

MOTION TO COMPEL THE RELEASE OF CRIMINAL RECORDS

Mr. Hart moves this Honorable Court to compel the State to release the entirety of his criminal record to his non-lawyer representative. In support of this Motion he states the following:

1. The State of New Hampshire has charged Mr. Hart with Criminal Trespass and Disorderly Conduct. A trial date is scheduled for late May.
2. Although the State has indicated that it will not attempt to introduce Mr. Hart's criminal history at a potential sentencing hearing, the Court itself may inquire as to the contents thereof.
3. Mr. Hart requires the exact copy of his III and in-state misdemeanor records that potentially could be presented to the Court during a theoretical sentencing hearing, should he be found guilty, to prepare arguments for the Court regarding his sentence.

Prayer for Relief

WHEREFORE, Joseph Hart requests this Honorable Court to order the following relief:

- A. Order the State to release the entirety of his III and in-state misdemeanor/felony records to his non-lawyer representative; and
- B. Grant any other relief this Honorable Court deems just and proper.

Respectfully submitted,

Joseph Hart
PO Box 833
Keene, NH

By Bradley Jardis

04/25/24

PURSUANT TO CIRCUIT COURT-DISTRICT DIVISION RULE 1.8 (B), THIS MOTION BEING GROUNDED IN BOTH FACT AND NOTICE PLEADING, COUNSEL ACKNOWLEDGES THAT MAKING FALSE STATEMENTS COULD SUBJECT HIM TO CRIMINAL PENALTIES.

PURSUANT TO CIRCUIT COURT-DISTRICT DIVISION RULE 1.8 (C), A GOOD FAITH ATTEMPT TO OBTAIN CONCURRENCE HAS BEEN MADE WITH ATTORNEY GEORGE WATTENDORF TO ACQUIRE THE RECORDS SOUGHT.

I hereby certify that on the above date, a copy of this Motion was mailed to Attorney George Wattendorf.

Bradley Jardis
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