

FILED

JUSTIN J. RECTOR

501 W. Hwy 66

KINGMAN, AZ 86401

DEFENDANT IN PRO PER

2019 FEB 26 AM 9:30

VIRLYNN TINNELL
SUPERIOR COURT CLERK

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,

PLAINTIFF,

VS.

JUSTIN JAMES RECTOR

DEFENDANT.

NO. CR-2014-01193

MOTION FOR FUNDING
TO APPOINT EXPERT

I JUSTIN RECTOR, REPRESENTING MYSELF IN
THIS CASE, RESPECTFULLY REQUESTS THIS COURT
TO ORDER FUNDING BE PROVIDED FOR A CRIMINAL
ATTORNEY EXPERT TO PREPARE, APPEAR AND PROVIDE
EXPERT TESTIMONY AT THE MARCH 4TH EVIDENTIARY
HEARING.

IN ORDER TO PRESENT NEEDED INFORMATION TO
THE COURT THIS INDEPENDENT EXPERT IS NEEDED
TO ADDRESS SPECIFIC IDENTIFIED ISSUES THAT
IMPACTED DEFENDANT RECTOR'S ABILITY TO
INTELLIGENTLY ENTER INTO THE PLEA AGREEMENT.
THE DEFENDANT CANNOT TESTIFY TO THE LEGAL
STANDARDS AND ISSUES PRESENTING.

S8015CR201401193

ADVISORY COUNSEL CANNOT TESTIFY TO THE LEGAL STANDARDS AND ISSUES PRESENTING WHILE ASSISTING THE DEFENDANT DURING THE HEARING. MS. CASSELLS TESTIMONY IS EXPECTED TO BE SELF SERVING, PROTECTIVE OF HER BAR LICENCE, AND THUS BIASED. THEREFORE THE INDEPENDENT EXPERT IS NEEDED TO PROVIDE TESTIMONY AS TO THE STANDARDS THAT HAVE BEEN BREACHED THAT DIRECTLY IMPACT THE DEFENDANTS ABILITY TO INTELLIGENTLY ENTER INTO THE PLEA AGREEMENT ON DEC, 18TH 2018.

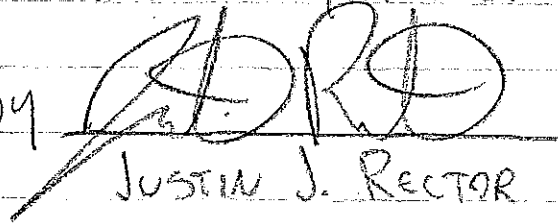
THE POSSIBLE ATTORNEY EXPERTS IDENTIFIED ARE WILLING AND ABLE TO PREPARE FOR AND APPEAR AT THE MARCH 4TH HEARING WITHOUT CAUSING DELAY. WITH TWO POTENTIAL EXPERTS IDENTIFIED, EITHER WILL REQUIRE APPROXIMATELY 20 HOURS AT THE RATE OF \$400 AN HOUR TO COVER THE COST OF PREPARATION, REVIEW, PROVIDING THE STATE A PRE HEARING INTERVIEW AND APPEARING AT THE HEARING.

IT IS BELIEVED TO NOT GRANT THIS EXPERT INVITES LEGAL ERROR THAT IN ALL LIKELY HOOD WOULD RESULT IN ADDITIONAL ECONOMIC, JUDICIAL, TIME, AND EMOTIONAL EXPENSE TO THE COURT, THE VICTIMS, THE TAXPAYERS AND TO THE DEFENDANT. THERE ARE NO OTHER AVAILABLE

WITNESSES WHO HAVE THE QUALIFICATIONS
TO PRESENT THIS LEVEL OF INFORMATION
TO THE COURT.

RESPECTFULLY SUBMITTED THIS 20TH DAY OF FEB. 2019

By



JUSTIN J. RECTOR
DEFENDANT IN PRO PER

A COPY OF THE
FOREGOING SENT
THIS SAME DAY TO:

HONORABLE LEE F. JANTZEN
SUPERIOR COURT JUDGE

RON GILLEN

MOHAVE COUNTY LEGAL DEFENDER

ADVISORY ATTORNEY FOR DEFENDANT

By _____