ATTACHMENT 4

STATE OF MAINE	SUPERIOR COURT
CUMBERLAND COUNTY, ss	SITTING AT: PORTLAND
	CRIMINAL ACTION
	DOCKET NO. CUMCD-CR-2019-0623
	CUMCD-CR-2017-6994
STATE OF MAINE,)
)
Plaintiff)
))
v. Kam leung,) MOTION TO SUPPRESS
) PURSUANT TO
) M.R.Crim.P. 41A
)
	ý
	ý
Defendant)

NOW COMES the Defendant, Kam Leung, by and through his Attorney, Robert C. Andrews and respectfully requests this Court to grant this Motion to Suppress for the following reasons:

- 1. Charges against if operating after suspension and violation of conditions of release are currently pending in the Superior Court in Cumberland County.
- 2. The charges are in whole or in part based on evidence that was illegally obtained.
- 3. The evidence was obtained in violation of the United States Constitution and the Constitution of the State of Maine.
- 4. Maine State Trooper Patrick Flanagan and Maine State Trooper Robert Burke are engaged in selective law enforcement tactics that involve discrimination based on race in violation of the Due Process and Equal Protection clauses of United States Constitution and the Constitution of the State of Maine. See State v. Soto, 734 A.2d 350 (N.J. 1996)

WHEREFORE, the Defendant, Kam Leung, requests this Court to ORDER:

1. All evidence illegally obtained and all evidence obtained as a result of illegally obtained evidence be suppressed and excluded from the State's case in chief.

Dated: August 16, 2019

Robert C. Andrews

Robert C. Andrews Bar Number 8980 117 Auburn St., Suite 201 Portland, Maine 04103 207-879-9850

PROPOSED ORDER

It is hereby **ORDERED** after hearing and consideration that the Motion to Suppress is:

GRANTED

DENIED

Dated:

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Justice, Maine Superior Court