

MEMORANDUM OF POINTS AND LEGAL AUTHORITIES

I. POINTS AND FACTS:

1. EFFECTIVE 1-1-2014, PROSECUTORS IN ARIZONA ARE ETHICALLY REQUIRED TO DISCLOSE CLEARLY EXCULPATORY MATERIAL EVIDENCE TO THE DEFENDANT, THAT WAS DELIBERATELY CONCEALED FROM DEFENDANT AT TRIAL. PROSECUTOR KNOWS THIS EVIDENCE ESTABLISHES THAT DEFENDANT WAS CONVICTED OF AN OFFENSE THAT THE DEFENDANT DID NOT COMMIT, THE PROSECUTOR SHALL TAKE APPROPRIATE STEPS, TO SET ASIDE THE CONVICTION. RULE 42 ER 3.8(g)(1)(2)(h) SPECIAL RESPONSIBILITIES OF A PROSECUTOR

2. PROSECUTOR SHAWN FULLER KNEW AS OF 1-13-2014, THAT YA MENTAL HEALTH RECORDS SHOWED R. BURNETT WAS DIAGNOSED WITH AT LEAST SEVEN (7) MAJOR MENTAL HEALTH DISORDERS:

1. PARANOID PERSONALITY DISORDER;
2. PANIC ATTACKS EVERY SIX (6) HOURS;
3. SCHIZOTYPAL PERSONALITY DISORDER;
4. P.T.S.D.
5. ASPERGER'S;
6. DEPRESSION;
7. ANXIETY;

IS THE "SMOKING GUN" EVIDENCE OF THE IJM, IPM, OGM, CSE-ICI-CDC CONSPIRACY TO CONVICT AN INNOCENT PERSON M. VODEN. PROSECUTOR SHAWN FULLER NEVER DISCLOSED THIS EVIDENCE, PROVES FULLER COULD NOT CONVICT M. VODEN, IF THE EVIDENCE WAS DISCLOSED TO THE JURY.