## **KENNETH VERCAMMEN** & ASSOCIATES, PC

2053 Woodbridge Ave. Edison, NJ 08817 732-572-0500 Attorney for Defendant, d1	
STATE OF NEW JERSEY	m1 Docket No.
VS	MOTION TO SUPPRESS STATEMENTS TAKEN IN
Defendant d1	VIOLATION OF MIRANDA AND THE FIFTH AMENDMENT UNDER EVIDENCE RULE 104
TO: m1 Prosecutor m1 Judge and Court Administrator	
PLEASE TAKE NOTICE that on	at o'clock
or as soon thereafter as counsel may be heard, the undersigned, counsel for the	
Defendant d1, will move before the above court, for an Order:	
Suppressing any and all evidence or statements obtained as a result of the	
questioning and illegal custodial interrogation of defendant.  No Miranda consent form was signed by the defendant. Any statements obtained were obtained in violation of Miranda v Arizona, the Fifth Amendment to the United States Constitution and New Jersey Constitution. The questioning was illegal and in contravention of the defendant's constitutional rights. Any statements were obtained without a voluntary, knowing and intelligent waiver of constitutional rights.	
Date:	BY: KENNETH A. VERCAMMEN, ESQ.