

**KENNETH VERCAMMEN
& ASSOCIATES, PC**
2053 Woodbridge Ave.
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732-572-0500
Attorney for Defendant, d1

STATE OF NEW JERSEY

vs

Defendant d1

m1
Docket No.

MOTION TO SUPPRESS
STATEMENTS TAKEN IN
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.

BY: KENNETH A. VERCAMMEN, ESQ.

Date: _____