



Conviction, I just found out I could file MOTION FOR DISCOVERY and other things to help my case. If I had known I could have requested this information sooner. So I am asking this court not to hold lack of experience against me, and grant my MOTION to COMPEL.

P 4.) Under ( Brady V. Maryland ) the Prosecution has a requirement to Disclose Material Evidence favorable to the accused. This duty was further extended in ( ) Giglio V. United States ) where the court concluded that the Prosecution must also disclose impeachment evidence and that is what I am asking for!! Also see ( U.S. V. Bagley ) and two other cases ( State V. Gollehon ) as well as ( State V. Giddings ). Based on the case here the District Court should have granted my Motion to Compel.

P 5.) Clearly my rights were violated when the state failed to disclose to the Defendant this Impeachment Evidence when they had a obligation to do so under § 46-15- 322 Montana Discovery Statues. When a request was made September 10, 2012 and in doing so the Prosecution violated my rights to a fair trial.

P 6.) I requested the records so I could compel my Post Conviction and get it filed. Without the records requested I am unable to weight the amount of harm the State caused when they withheld this information from the defense at trial.

P 7.) I am asking this court to grant this motion and order the Prosecution to give the Defendant the requested records.

P 8.) Lawrence Lee's complete criminal record and history as well as the criminal records and history of Skyler Ranky, Lonie Boyd, James Palater. All who wear witnesses against the Defendant at trial.

P 9.) The complete Probation and Parole files of the named individuals in this motion as well as there jail or prison records and any juvenile records or maintained by the State.

P 10.) And any other records or information the Prosecution has in regards to there work as confidential informant including Lonie Boyed, Skyler Ranky. Lawrance Lee and Jaims Palafer all of witch are named in this motion.

P 11.) As a Pro'se litgit I have no idea what am doing and I ask this court to remember that and met me half way. My rights were violated and this is the only way I can think to set things right, without this information I am limited too what I can do inreguards to my Post Conviction at every stage of my trail. The Prosecution violated my right to Due Processes and I have asked the District Court to help set things right and they failed, so I am asking this court to set things right and grant my Motion to Compel and order the Prosecution to give me the requested records.

Dated this 30<sup>th</sup> day of August 2016.

  
Micheal Jeffery Root

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**CERTIFACTE OF SERVICE**

This is to certify that on the 30<sup>th</sup> dat of August, 2016, the foregoing document was duly served by mail or by hand delivery. This is a true an accurate copy of the foregoing document and postage was pre-paid, addressed to the following party:

Hon. Tim Fox, Attorney General  
State of Montana  
P.O. Box 201401  
Helena, MT 59620-1401

BY: 