



6. That this all constitutes impeachable and thus exculpatory information which the Government must provide to the Defense.

7. That the government cannot be willfully blind to such information and must conduct due diligence research.

8. That the above is a non-exhaustive list and that all *Brady* and *Kyles* information should be ordered to be immediately turned over to the Defense. This is an affirmative action of the Government, with or without a Court Order.

WHEREFORE, Defendant, by Counsel, request this Court issue an order mandating the Government turn over all *Brady* and *Kyles* evidence instanter and for all their just and proper relief.

Respectfully submitted,

/s/ Bryan M. Truitt

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### **CERTIFICATE OF SERVICE**

The undersigned counsel for Defendant does hereby certify that a copy of the foregoing was served on counsel of record via the District Court's CM/ECF system on June 29, 2017.

/s/ Bryan M. Truitt

Bryan M. Truitt; 20684-64