

**IN THE COURT OF COMMON PLEAS
MONTGOMERY COUNTY, PENNSYLVANIA – CRIMINAL DIVISION**

COMMONWEALTH OF PENNSYLVANIA	:	
	:	No. 6239-15
v.	:	No. 8423-15
	:	
KATHLEEN G. KANE	:	

CLERK OF COURTS
OFFICE
MONTGOMERY COUNTY
PENNSYLVANIA
2016 MAR -4 PM 2:47

**OMINBUS PRETRIAL MOTIONS
OF ATTORNEY GENERAL KATHLEEN G. KANE**

Attorney General Kathleen G. Kane, by and through her counsel, Gerald L. Shargel, Esq., hereby moves the Court before the Honorable Wendy Demchick-Alloy, Justice of the Court of Common Pleas, Montgomery County, 2 East Airy Street, Norristown, Pennsylvania for an Order:

1. Recusing the Bench of the Montgomery County Court of Common Pleas in its entirety and appointing an out-of-county judge, because three judges on the Bench have close ties to this case and a clear interest in its outcome;
2. Suppressing the evidence and testimony gathered by the Investigating Grand Jury and quashing the charges, because the Investigating Grand Jury proceedings were unlawful and unconstitutional;
3. Quashing the charges because Attorney General Kane is the victim of selective and vindictive prosecution;
4. Quashing the charges because the Commonwealth has willfully refused to provide a bill of particulars;
5. Quashing counts because they are duplicitous, and merging counts because they are multiplicitous;

6. Directing the Commonwealth to produce all recordings made through a joint investigation with Federal law enforcement;
7. Directing the Commonwealth to produce information on any threats, promises, inducements or benefits extended to witnesses or potential witnesses;
8. And for any other relief the Court deems just and proper.

Dated: New York, New York
March 4, 2016

Winston & Strawn LLP



Gerald L. Shargel, Esq.

Seth C. Farber, Esq.

Ross M. Kramer, Esq.

Attorneys *Pro Hac Vice* for Attorney General

Kathleen G. Kane

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