

STATE OF MINNESOTA
COUNTY OF RAMSEY

DISTRICT COURT
SECOND JUDICIAL DISTRICT

State of Minnesota,)
)
 Plaintiff,)
)
 vs.)
)
 Luce Guillen-Givins,)
)
 Defendant.)
)

**DEFENDANT'S MOTION TO DISMISS
BASED ON DISCRIMINATORY
INVESTIGATION AND PROSECUTION**

Court File No. 08-10342

TO: THE COURT; AND THE STATE OF MINNESOTA, PLAINTIFF ABOVE
NAMED; AND ITS ATTORNEY HEIDI WESTBY, ASSISTANT RAMSEY
COUNTY ATTORNEY, 50 WEST KELLOGG BLVD., SUITE 315, ST. PAUL,
MN 55102

PLEASE TAKE NOTICE that on February 2, 2010 at 9:00 a.m., as soon thereafter as
counsel may be heard, before the Honorable Teresa R. Warner, Defendant Luce Guillen-Givins,
through undersigned counsel, will move the Court for an Order dismissing all charges against her
in the above-captioned case on the grounds that police violated her state and federal
constitutional rights to free speech and equal protection by singling her out for investigation,
arrest and prosecution based exclusively on her political beliefs. This motion is based on all
files, records, arguments of counsel, the accompanying Memorandum of Law with attachments,

and evidence presented at the hearing of this Motion.

Dated: January 25, 2010

LAW OFFICE OF JORDAN S. KUSHNER

By _____
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