

FILED

NOV 29 2021

IN THE SUPREME COURT OF THE STATE OF NEVADA
BY Elizabeth Brown
DEPUTY CLERK

LUIS ANGEL CASTRO,

SUPREME COURT No. 83680

APPELLANT,

DISTRICT COURT Case No. A-21-835821-W

vs

THE STATE OF NEVADA

APPELLANT, LUIS A. CASTRO'S EX PARTE MOTION
FOR ANCILLARY SERVICES TO INCLUDE FEES
TO HIRE AN INVESTIGATOR

THIS PRO SE MOTION IS AN OFFSHOOT FROM APPELLANT'S
WRIT OF HABEAS CORPUS, AND PRAYS THERE IS APPLICABLE
NEVADA REVISION STATUTE OR LAW, THAT ALLOWS FOR
THIS COURT'S CONSIDERATION OF THE ABOVE ENTITLED
REQUEST.

AN ACTUAL INVESTIGATION OF THE FACTS IN
THIS CASE, WILL REVEAL THAT THE APPELLANT WAS
ROBBED OF AN HONEST AND FAIR TRIAL.

IN ADDITION, THE APPELLANT RESPECTFULLY ASK
NOT TO BE HELD TO THE SAME LEGAL STANDARDS AS
AN ATTORNEY, REGARDING THE DRAFTING OF THIS
MOTION, AND OF THE USAGE OF FUTURE LEGAL
INSTRUMENTS.

STATEMENT OF FACTS

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3 TRIAL COUNSEL WAS INEFFECTIVE FOR FAILING TO
4 INVESTIGATE THE CHARGES AND EVIDENCE OF THE
5 STATE'S CASE. HAD COUNSEL DONE AN ACTUAL INVESTIGATION HE WOULD HAVE DISCOVERED - REVEALED
6
7 THAT THE APPELLANT DID NOT PARTICIPATE AT ALL
8 IN THE HARM DONE TO THE ALLEGED VICTIM.

9
10 AN INVESTIGATOR COULD HAVE REVEALED THAT THE
11 ALLEGED VICTIM WAS A RECOGNIZABLE INDIVIDUAL IN
12 THE DRUG TRADE; AND THE CO-DEFENDANTS INTENT
13 WAS TO EXTRACT THE INFORMATION OF THE WHERE-
14 ABOUTS OF HIS DRUGS AND MONIES.

15
16 FROM TRIAL COUNSEL'S FAILURE TO INVESTIGATE,
17 ANY RATIONAL PERSON CAN ASCERTAIN THAT HE NEVER
18 INTENDED TO PROCEED TO TRIAL AND THAT HIS SOLE
19 INTENT WAS TO HAVE APPELLANT PLEA GUILTY.

20
21 AN INVESTIGATOR IS NECESSARY TO PROVE THAT
22 TRIAL COUNSEL USED CASTRO'S FAMILY TO COERCE
23 HIM INTO PLEADING GUILTY, BY TALKING TO THEM,
24 GIVING THEM THE FALSE STATEMENT - PROMISE, THAT
25 CASTRO'S SENTENCE WOULD BE 15 YEARS TO LIFE, -

1 WITH THE POSSIBILITY OF PAROLE. HE WENT EVEN
2 FURTHER, APPEALLING TO CASTRO'S PARENTS TO
3 ENTERTAIN AND CONVINCE HIM TO PLEA GUILTY
4 OF THE KIDNAPPING CHARGES.

5
6 THE APPELLANT REQUIRES AN INVESTIGATOR TO
7 ADDRESS A LOTION OF FACTS THAT TRIAL COUNSEL
8 FAILED TO DISCOVERED, THAT COULD HAVE SHOWN
9 THAT CASTRO'S INVOLVEMENT WAS INDUCED AND
10 MANIPULATED BY THE CO-DEFENDANTS

11
12 THEREFORE, THE APPELLANT PRAYS THAT THIS
13 HONORABLE COURT GRANT HIM THE REQUEST
14 FOR THE GOVERNMENT PAY FOR THE FEES IN
15 ORDER TO HIRE AN INVESTIGATOR.

16
17 DATE THIS 21 DAY OF NOVEMBER, 2021

18
19 Respectfully Submitted

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21  Luis Angel Castro
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