

**UNITED STATES OF AMERICA
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 21-CR-60067-AHS

UNITED STATES OF AMERICA,

JUDGE: SINGUAL

PLAINTIFF,

v.

PAUL NICHOLAS MILLER,

DEFENDANT.

**DEFENDANT'S MOTION FOR APPOINTMENT OF MENTAL HEALTH EXPERT
FOR CONFIDENTIAL REPORT RE: COMPETENCY AND SANITY**

The Defendant, PAUL NICHOLAS MILLER, by and through his undersigned counsel, files this his Motion for Appointment of Mental Health Expert for Confidential Report Re: Competency and sanity.

As grounds therefore the Defendant would allege:

1. The Defendant currently faces a Superseding indictment for Count 1- Possession of a firearm by convicted felon, Count 2- Possession of ammunition by a convicted felon, and Count 3- Possession of an unregistered firearm. The Government has indicated they are still investigating and considering additional charges.
2. The Defendant had a serious automobile crash approximately 5 years ago and suffered a significant head injury.
3. After counsel met and spoke with the Defendant and his family, counsel has a good faith belief that competency and sanity are issues that must be investigated by the

defense.

4. While the Defendant's family have hired undersigned counsel for a permanent appearance, there are insufficient resources available with which to obtain a mental health expert is necessary for the defense.
5. AUSA Kiran Bhat was contacted by counsel, who indicated he does not object to the appointment of a mental health expert to assist the defense, but does not agree that it should be at government expense.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of March, 2021 undersigned counsel electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification to all parties involved.

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