

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Case No. 16 CR 00064-WCG-DEJ
v.	)	
	)	Honorable William Griesbach
RON VAN DEN HEUVEL and	)	Magistrate Judge David E. Jones
KELLY VAN DEN HEUVEL,	)	
	)	
Defendants.	)	

**DEFENDANT KELLY VAN DEN HEUVEL’S MOTION FOR DISCLOSURE OF  
INTENT TO USE EVIDENCE OF OTHER CRIMES, WRONGS, OR ACTS UNDER  
FEDERAL RULES OF EVIDENCE 404 (b)**

Defendant, KELLY VAN DEN HEUVEL, by and through her attorneys, pursuant to Federal Rules of Evidence, Rule 404(b), hereby moves this Honorable Court for an Order requiring the Government to disclose its intent to use any evidence of other crimes, wrongs, or acts as proof of motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, accident, or any other purpose. In this regard, the Government should specify the particular crime, wrong, or act to be used and the particular theory upon which it is admissible.

Respectfully submitted,

/s/ Andrew Porter

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