

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case No. 16 CR 64

RONALD D. VAN DEN HEUVEL,
Defendant.

MOTION TO DISCLOSE F.R.E. 404b EVIDENCE

COMES NOW the above named defendant, by his attorney, Robert G. LeBell, and demands that the government disclose any evidence which it intends to introduce at trial which arguably, or in fact, constitutes other crimes, wrongs, or acts evidence pursuant to F.R.E. 404b.

Dated at Milwaukee, Wisconsin, this 16th day of June, 2017.

Respectfully submitted,

/s/ Robert G. LeBell

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