

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 16-334(1) (JNE/KMM)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	MOTION FOR DISCLOSURE
)	OF 404 EVIDENCE
)	
PAUL R. HANSMEIER,)	
)	
Defendant.)	

The defendant, Paul R. Hansmeier, through his attorneys, Andrew H. Mohring and Manny K. Atwal, hereby moves the Court for an order directing the government to immediately disclose and identify any “bad act” or “similar course of conduct” evidence it intends to offer at trial pursuant to Rule 404 of the Federal Rules of Evidence or analogous rule, and further directing the government to identify the basis for the evidence’s admissibility and the witnesses through whom such evidence will be presented at trial. We ask that the Court establish a deadline in the very near future for the submission of this material.

This motion is based on the indictment, the file and record in the above-entitled action, the attached memorandum and any and all other matters which may be presented prior to or at the time of the hearing of said motion.

Dated: April 24, 2017

Respectfully submitted,

s/ Andrew H. Mohring

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