

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

UNITED STATES OF AMERICA)

v.)

GLADYS HARUN, a/k/a “GLADYS
CHEGE”)
_____)

CASE NO. 3:22-CR-09

**MOTION FOR NOTICE OF EVIDENCE OF OTHER CRIMES, WRONGS OR ACTS
TO BE USED AGAINST THE DEFENDANT**

COMES NOW the Defendant, Gladys Harun, a/k/a “Gladys Chege”, (hereinafter, the “Defendant”), by and through counsel, pursuant to Fed. R. Evid. 404(b) and L. Cr. R. 16.2, and hereby respectfully moves this Honorable Court to order the United States of America (hereinafter “Government”) to provide reasonable notice to Defendant of the general nature of any and all evidence of other crimes, wrongs or acts, which the Government intends to introduce against Defendant, in advance of trial, and the Government’s purpose for its intended use of such evidence. See Fed. R. Evid. 404(b)

RESPECTFULLY SUBMITTED this 24th day of January, 2023.

By: /s/ D. Robert Busbee

D. Robert Busbee, Esq.

Georgia Bar No. 186336

Attorney for Defendant Gladys Harun, a/k/a “Gladys Chege”

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CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the notice of electronic filing (“NEF”) which was generated as a result of electronic filing in this Court.

RESPECTFULLY SUBMITTED this 24th day of January, 2023.

By: /s/ D. Robert Busbee

D. Robert Busbee, Esq.

Georgia Bar No. 186336

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