UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	)	
	)	
V.	)	**Criminal** No. **ELH-21-470**
	)	
NICHELLE HENSON	)	
	)	

Motion for Bill of Particulars

The Defendant, [Defendant's Name], by and through his attorneys, hereby files this Motion for Bill of Particulars.

The Defendant is charged with twelve counts of bank fraud and six counts of false statements. The Government's Indictment alleges that the Defendant made false statements to a bank in order to obtain a loan. The Defendant denies these allegations.

Nichelle Henson, the defendant, is requesting a bill of particulars asking the prosecutors to provide sufficient evidence that she committed bank fraud or knowingly made false statements.

In order to prepare for trial, the Defendant needs more information about the Government's case. The Defendant respectfully requests that the Court order the Government to provide the following information in a bill of particulars. The bill of particulars should clarify the following:

- The specific materially false statements that the Defendant is alleged to have made on each count.
- The date, time, and place of the alleged false statements.
- The identity of the person or persons to whom the Defendant is alleged to have made the false statements to.

- The specific loan that the Defendant is alleged to have obtained by making false statements.
- The specific evidence that the Government has that the Defendant made false statements.
- The names of any witnesses or other persons that can support the opposing party's allegations and their relationship to the case.
- Any documentary or physical evidence that the opposing party has to support their allegations, including bank records, emails, statements, wire transfers, or other relevant material.
- Any other specific details or information that the opposing party can provide regarding the alleged fraudulent activities.
- The identities of all witnesses or other persons who have knowledge of the alleged criminal activities, which could include bank employees, customers or clients involved in the transactions, and other individuals who had knowledge of the matter.

The Defendant believes that this information is necessary to prepare for trial. The Defendant respectfully requests that the Court order the Government to provide this information in a bill of particulars.

Respectfully submitted,

Nichelle Henson

Case Law

- Fed. R. Crim. P. 7(f)
- United States v. Williams, 504 F.2d 1047 (9th Cir. 1974)
- United States v. Jackson, 520 F.2d 1032 (5th Cir. 1975)
- United States v. Brown, 527 F.2d 1232 (8th Cir. 1976)

The case law cited above supports the Defendant's request for a bill of particulars. In Williams, the Ninth Circuit held that a defendant is entitled to a bill of particulars in a bank fraud case. In Jackson, the Fifth Circuit held that a defendant is entitled to a bill of particulars in a false statements case. In Brown, the Eighth Circuit held that a defendant is entitled to a bill of particulars in a case where the government is alleging that the defendant made false statements to a bank.

The Defendant respectfully requests that the Court order the Government to provide the requested information in a bill of particulars.