

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:21-cr-118 (RCL)
	)	
LISA MARIE EISENHART	)	
_____	)	

**DEFENDANT’S MOTION FOR NOTICE OF GOVERNMENT’S  
INTENT TO INTRODUCE OTHER BAD ACTS EVIDENCE**

NOW COMES Defendant LISA MARIE EISENHART, by and through undersigned counsel, and moves this Court for an Order directing the Government to provide written notice of its intent to use at trial any evidence of prior arrests, convictions, uncharged misconduct or other bad acts against this Defendant, by a date certain that is sufficiently in advance of trial to allow for adequate defense follow-up investigation and trial preparation. This request is made under Fed. R. Evid. 404(b) and 609, and Fed. R. Crim. P. 16.

The Defendant’s request also includes the production of all evidence, documents, records of judgments and convictions, photographs and tangible evidence, and information pertaining to any such judgments and convictions or prior bad acts. This request includes but is not limited to a request for any “rap sheet” and/or NCIC computer check available on the Defendant, including any other name or alias that the Government contends was used by this Defendant in the past.

Evidence of a defendant’s criminal record is discoverable under Fed. R. Crim. P. 16(a)(1)(D). Evidence of prior similar acts is discoverable under Fed. R. Crim. P. 16, Fed. R. Evid. 404(b) and 609. Notice of the Government’s intent to use such evidence will promote due process and prevent prejudicial surprise at trial. Accordingly, this motion should be granted.

