

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 10-00162-16-CR-W-FJG
)	
THEODORE S. WIGGINS,)	
)	
Defendant.)	

**GOVERNMENT'S NOTICE OF INTENT
TO USE CONVICTIONS AS IMPEACHMENT**

Comes now the United States of America, by and through its undersigned attorneys, and files its Notice of Intent To Use Convictions as Impeachment, pursuant to Fed. R. Evid. 609(a)(1), if the defendant testifies. The government states the following in support:

Theodore S. Wiggins has previously been convicted in the Circuit Court of Jackson County, Missouri, in the following felony cases: distribution of a controlled substance on August 1, 2000, in Case Number CR98-03880; robbery on October 26, 2000, in Case Number CR99002436-01; robbery and armed criminal action on January 26, 2009, in Case Number 16CR0100231502; and in Clay County, Missouri, for possession of a controlled substance in Case Number 7CR199001701, on June 22, 2000. Notice of these prior convictions and certified copies of the same have been made available to the defense through discovery in this case.

Wherefore, the government respectfully files its notice of intent to use these convictions as impeachment, pursuant to Fed. R. Evid. 609(a)(1), should the defendant testify.

Respectfully submitted,

Beth Phillips
United States Attorney

By */s/ Brent Venneman*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on February 7, 2011, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record:

Michael Walker
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/s/ Brent Venneman

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