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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13
14 v.
15 DEBORAH FRANCES LAUGHLIN,
16 aka Deborah Frances Isgrigg,
aka Deborah Frances Hunt,
17 aka Debbie Frances Evans,
aka Deborah Frances Thompson,
18
19 Defendant.

CASE NO. 2:19-CR-229 WBS

UNITED STATES' NOTICE OF INTENT TO
INTRODUCE EVIDENCE PURSUANT TO
FEDERAL RULE OF EVIDENCE, 404(b)

19 The United States hereby provides notice of its intent to introduce evidence that may be
20 governed by Federal Rule of Evidence 404(b) in order to show, among other things, motive, intent, plan,
21 knowledge, and absence of mistake or accident. The government's position is that this evidence is
22 properly viewed as intrinsic evidence of the offense charged in the Indictment. Nevertheless, in an
23 abundance of caution, the government provides notice under Rule 404(b) regarding the "general nature
24 of such evidence" that the government intends to introduce in its case in chief should this matter proceed
25 to trial. Specifically, the government intends to introduce evidence that shows in November 2018,
26 defendant, Deborah Laughlin, told news media that (1) she lost her home/ trailer home in Paradise,
27 California, as a result of the Camp fire, and (2) she lost her dentures after having to evacuate so quickly
28 that she did not have time to grab her dentures, which were in a "bowl soaking." The evidence the

government intends to introduce may include the news articles identified below, the audio recording of Laughlin's statement identified below, and other records or testimony related to the statements made by Laughlin to the media in connection with the Camp fire.

1. <http://www.caprado.org/articles/2018/12/13/some-camp-fire-evacuees-lost-everything-even-their-teeth-heres-how-communities-are-stepping-up/> (Pauline Bartolone, Some Camp Fire Evacuees Lost Everything—Even Their Teeth. Here's How Communities Are Stepping Up, CAPITAL PUBLIC RADIO, [Article and Audio Recording] Dec. 13, 2018)
2. https://www.washingtonpost.com/national/best-thanksgiving-of-my-life-amid-wildfire-destruction-evacuees-find-meaning-in-holiday/2018/11/21/f5e02e28-ede6-11e8-8679-934a2b33be52_story.html (Eli Rosenberg, 'Best Thanksgiving of my life': Amid wildfire destruction, evacuees find meaning in holiday, WASH. POST, Nov. 21, 2018)
3. <https://www.latimes.com/local/lanow/la-me-remains-paradise-fire-deaths-20181121-story.html> (Ruben Vives, Corina Knoll, Alene Tchekmedyan, Rescuers fear rains will wash away victims' remains; 870 still missing in California fire, LA TIMES, November 21, 2018)

The government intends to introduce evidence that on November 3, 2018, Laughlin was living at a residence in Willows, California, not Paradise, California. The evidence will further show that on November 3, 2018, Laughlin was arrested while at this residence in Willows, California, and remained in jail until approximately November 13, 2018, which was several days after the Camp fire began on November 8, 2018.

Dated: December 16, 2019

McGREGOR W. SCOTT
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By: /s/ SHELLEY D. WEGER
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