

**IN THE UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF ILLINOIS
AT PEORIA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal No. 06- 10019
)	
ROBERT LAWRENCE,)	
)	
Defendant.)	

GOVERNMENT’S NOTICE OF EXPERT WITNESS TESTIMONY

Now comes the United States of America, by and through its attorneys, Rodger A. Heaton, United States Attorney, and Gerard A. Brost, Assistant United States Attorney for the Central District of Illinois, and hereby provides notice of its intent to use the following expert witness:

The government may call Kathy Jo McBride, Special Agent, United States Department of Treasury, Internal Revenue Service, and James Pogue and Rose Shawgo, Revenue Agents for Internal Revenue Service, who will testify, based on their knowledge, training, education and experience regarding the requirements under the federal laws, including the Internal Revenue Code, for filing tax returns and making payments of federal income taxes and to the defendant’s legal obligations under the Internal Revenue laws to file and pay his federal income tax liabilities for years 1999, 2000 and 2001. They will rely upon the financial records in this case. These witnesses may provide the calculations establishing the defendant’s unpaid tax liabilities for years

1999, 2000 and 2001. (See attached resumes of McBride and Pogue. Shawgo's resume will be provided as soon as possible.)

Respectfully submitted,

UNITED STATES OF AMERICA

RODGER A. HEATON
UNITED STATES ATTORNEY

By: s/ Gerard A. Brost
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CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2006, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Oscar A. Stilley
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s/ Kim Ritthaler
Legal Assistant