

NITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) Crim. No. 16-334(1) (JNE/KMM)
)
 PAUL R. HANSMEIER,)
)
 Defendant.)

DEFENDANT’S PRETRIAL MOTION TO DISMISS

Pursuant to FRCrP 12, Defendant Paul Hansmeier asks the Court to dismiss Counts 1-17 of this prosecution as set forth in the charging document, (ECF 1), based on at least the following:

1. The charging document fails to allege facts that constitute the charged criminal offenses at issue. The above charges are predicated upon a constitutionally- and legally-invalid theory and prosecution.

2. The charging document is vague and uncertain, and thus fails to be a plain, concise, and definite written statement of the essential facts constituting the offenses charged. Thus, the charging document fails to adequately and fairly inform the accused of the charged offenses.

This Motion is accompanied by a Memorandum of Law, explaining and expanding upon these reasons for the requested relief of pretrial dismissal under FRCrP 12.

Dated: April 24, 2017

Respectfully submitted,

s/ Andrew H. Mohring

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