

STATE OF MARYLAND

VS

RONALD HOLT LIPSCOMB

* **IN THE**
*
* **CIRCUIT COURT**
*
* **FOR**
*
* **BALTIMORE CITY**
*
* **Case No.: 109007008**

.....
STATE'S IDENTIFICATION OF OTHER CRIMES, WRONGS OR ACTS IT INTENDS TO ADMIT UNDER RULE 5-404(b)

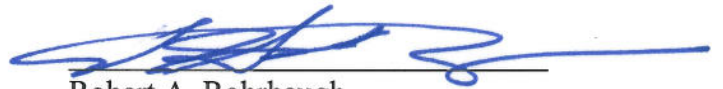
Now comes the State of Maryland by Robert A. Rohrbaugh, State Prosecutor, Thomas M. McDonough, Deputy State Prosecutor, Shelly S. Glenn, Senior Assistant State Prosecutor, and Tamara A. Gustave, Assistant State Prosecutor and Identifies Other Crimes, Wrongs or Acts it Intends To Admit Under Rule 5-404(b), as follows:

1. The State intends to offer evidence to prove its case in chief in the form of communications, scheduling and business records of Defendant Lipscomb, Helen Holton, Doracon Contracting, Inc. and the City of Baltimore, including e-mail communications, meeting schedules, and telephone records to establish nature and extent of Defendant Lipscomb's relationship with Ms. Holton and her knowledge of his activities as a developer and contractor in Baltimore City in connection with the development of Inner Harbor East, (including parcels B, D, and P). The evidence of these matters, including telephone records, e-mails, scheduling records and the like have been provided to Defendant in discovery or have been available for Defendant to inspect and copy.
2. The State intends to offer evidence to prove its case in chief in the form of communications from the Office of the State Prosecutor to Defendant,

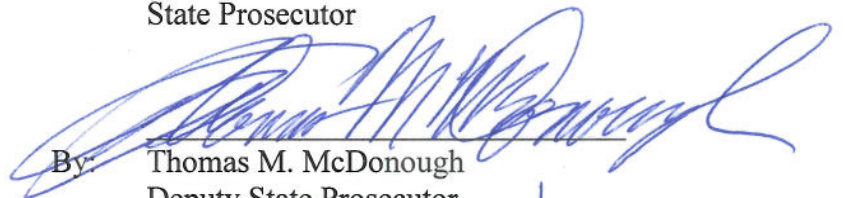
Doracon Contracting, Inc., and/or their agents, employees and counsel in connection with prior complaints of over-contributions on the part of Defendant Lipscomb and related entities. Copies of these communications have been provided to Defendant in discovery.

3. The State reserves the right to supplement this information in a timely fashion prior to trial.

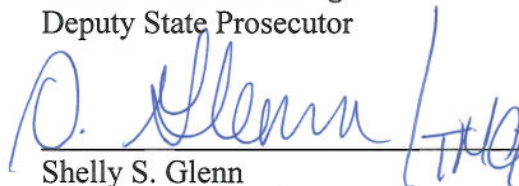
Respectfully submitted,



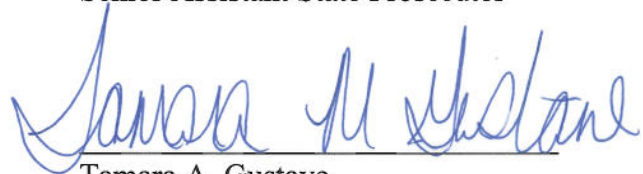
Robert A. Rohrbaugh
State Prosecutor

By: 

Thomas M. McDonough
Deputy State Prosecutor



Shelly S. Glenn
Senior Assistant State Prosecutor



Tamara A. Gustave
Assistant State Prosecutor
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300 East Joppa Road
Towson, Maryland 21286
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Points and Authorities

Maryland Rule 4-404(b)
Maryland Rule 4-263

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of April, 2009 a copy of the foregoing State's Identification of Other Crimes, Wrongs or Acts it Intends To Admit

Under Rule 5-404(b) was mailed, postage prepaid, to:

Gerard P. Martin, Esq.
Steven F. Wrobel, Esq.
Paul M. Flannery, Esq.
Rosenberg Martin Greenberg, LLP
25 South Charles Street, Ste 2115
Baltimore, Maryland 21201
Attorneys for Defendant,
Ronald Holt Lipscomb

I FURTHER CERTIFY that I am more than eighteen (18) years of age.

A handwritten signature in blue ink, appearing to read "Paul M. Flannery", is written over a horizontal line.