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W. J. LEWIS
CLERK OF DISTRICT COURT
2010 JUN 23 P 3:39
FILED
BY T. DILLMAN
DEPUTY

9 **MONTANA FIRST JUDICIAL DISTRICT COURT**
10 **LEWIS AND CLARK COUNTY**
11 **STATE OF MONTANA**

11 THE STATE OF MONTANA,)
12)
13 Plaintiff,)
14 vs.)
15 ARTHUR LEROY HEFFELFINGER,)
16 Defendant.)

Case No. CDC-2010-21

**MOTION FOR LEAVE TO FILE
AMENDED INFORMATION**

17 The undersigned, Special Assistant Attorney General and Special Deputy Lewis and Clark
18 County Attorney, moves the Court for leave to file an Amended Information charging the above-
19 named Defendant with committing the felony offenses of COUNT I: OPERATING A PYRAMID
20 PROMOTIONAL SCHEME (PONZI SCHEME), a FELONY, in violation of Mont. Code Ann. §§
21 30-10-324(6)(b) and 30-10-325; COUNT II: THEFT (Common Scheme), a FELONY, in violation of
22 Mont. Code Ann. §§ 45-6-301(2)(b) and 45-2-101(8); and COUNT III: EXPLOITATION OF AN
23 OLDER PERSON (Common Scheme), a FELONY, in violation of Mont. Code Ann. §§ 52-3-825
24 and 45-2-101(8) all as is set forth more fully in the Amended Information.
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1 The basis for the request is outlined in the State's Brief in Support of Motion for Leave to file
2 Amended Information filed concurrently with this Motion.

3 The State contacted counsel for the Defendant and was authorized by counsel to represent to
4 the Court that the Defendant has no objection to the relief requested herein.

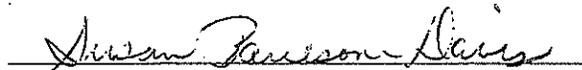
5 DATED this 23rd day of June, 2010.

6 
7 JESSE LASLOVICH
8 Special Assistant Attorney General
9 Special Deputy Lewis and Clark County Attorney

10 **CERTIFICATE OF SERVICE**

11 I HEREBY CERTIFY that a copy of the foregoing was served upon the Defendant's
12 attorney of record on the 23rd day of June, 2010, by placing a copy of the same in the United
13 States mail postage pre-paid addressed as follows:

14 BRENDAN MCQUILLAN
15 CANDIDA QUINN
16 Assistant Public Defenders
17 Office of the State Public Defender
18 139 N. Last Chance Gulch
19 Helena, MT 59601

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