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STATE OF MINNESOTA **DISTRICT COURT**

COUNTY OF WINONA **THIRD JUDICIAL DISTRICT**

State of Minnesota,

Plaintiff,

NOTICE BY PROSECUTING ATTORNEY OF EVIDENCE OF ADDITIONAL OFFENSES TO BE OFFERED AT TRIAL PURSUANT TO MINNESOTA RULE OF CRIMINAL PROCEDURE 7.02 AND MINNESOTA RULE OF EVIDENCE 404(b) (#1)

-vs-

Adam Taylor Fravel,

Defendant.

District Court File No.: 85-CR-23-937
County Attorney File No.: 0007990/65187

TO: The District Court of the Third Judicial District, and Adam Taylor Fravel, the defendant, through Zachary C Bauer, the defendant's attorney:

PLEASE TAKE NOTICE, that at trial in the above-entitled matter, the plaintiff will seek to admit evidence of other crimes, wrongs or acts of domestic violence, or verbal or physical abuse committed by the defendant against Madeline Jane Kingsbury. The description, time, and particulars of each crime, wrong, act or specific instances of domestic violence or verbal or physical abuse are provided in more detail in the recorded and transcribed statements of the following witnesses to investigating law enforcement officers and agents, supplemental reports prepared by investigative law enforcement officers and agents summarizing the following witnesses, interview notes of the following witnesses prepared by Winona County Attorney staff, and testimony of the following witnesses before the Winona County grand jury investigation into the disappearance and death of Madeline Jane Kingsbury. The witnesses are:

1. Krista Naber
2. David Kingsbury
3. Catherine Kingsbury
4. Megan Kingsbury
5. Hailey Ross
6. Katie Kolka

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7. Lauren Debois
8. Michaela Shaw
9. Holly Stamschror

The evidence of other crimes, wrongs or acts of domestic violence or verbal or physical abuse is admissible and relevant as relationship evidence under Minnesota Statutes §634.20 and to demonstrate that the defendant caused the death of Madeline Jane Kingsbury while engaged in a past pattern of domestic abuse against Madeline Jane Kingsbury as required under Minnesota Statutes §609.185 (a)(6).

Respectfully submitted,

Dated: November 17, 2023

/s/ Christina Galewski

Christina M. Galewski
Winona County Attorney
171 W Third Street
Winona, MN 55987
(507) 457-6310
Atty. Reg. No.: 390097
cgalewski@co.winona.mn.us