

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

CASE NO: 21-CR-175-TJK

v.

ENRIQUE TARRIO,  
Defendant.

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**DEFENDANT'S ENRIQUE TARRIO MOTION TO ADOPT in part AND JOIN CO-  
CONSPIRATOR'S MOTION FOR LEAVE TO RESPOND TO THE PRESS RELEASE  
ISSUED BY THE DEPARTMENT OF JUSTICE**

The Defendant, by and through undersigned counsel, hereby files this Motion to Adopt in part and Join co-conspirator, Zachary Rehl, Motion for Leave to Respond to the Press Release Issued by the Department of Justice [D.E. 377]

Defendant in this case was initially charged with a Second Superseding Indictment on March 7, 2022 [D.E. 305]. The Government argued, at the time, that the charges presented were premised on a search warrant executed on multiple data platforms connected to Mr. Tarrío. Nonetheless, this new Third Superseding Indictment adds no new material facts to the allegations to which Mr. Tarrío is charged. The only change in the Third Superseding Indictment is premised on facts that the Government was already aware of at the time of the Second Superseding Indictment. These new allegations seem in part to be in retaliation for Tarrío and co-conspirator's not entering a plea much like Co-conspirator, Donohoe entered on April 8, 2022 [D.E. 335/336].

The government filed the Third Superseding Indictment on June 6, 2022 to coincide with the January 6<sup>th</sup> Select Committee Hearings which are scheduled to commence on June 9, 2022 on prime-time TV. Additionally, the select Committee has announced that the hearings will

commence immediately and with the central focus of Enrique Tarrio and the Proud Boys. Documentary producer, Nick Quested who was “imbedded” documented via video recording the events on January 6, 2022 which Mr. Tarrio was not present for. This suspiciously seems orchestrated at the highest levels of government. This Honorable Court should raise caution as to the true intent of why the Government filed a Third Superseding with trumped up allegations with no new supporting facts on the eve of the January 6<sup>th</sup> Select Committee Hearings.

As the Court is aware, Mr. Tarrio has always been cooperative with law enforcement and has always complied with judicial orders in the past. Mr. Tarrio even voluntarily appeared before the January 6 Select Committee and answered questions honestly without invoking his right to remain silent. In accordance with Local Criminal Rules 57.7, Undersigned seeks the authority of this Honorable Court to make a press release with full compliance of the Protective Order entered by the Honorable Court [D.E.82].

**WHEREFORE**, it is respectfully requested that the Defendant’s Motion to Adopt in part and Join co-conspirator Motion for Leave to Respond to the Press Release Issued by the Department of Justice be Granted

**Respectfully submitted,**

*/s/ Nayib Hassan*

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 8<sup>th</sup> day of June 2022, the undersigned electronically filed this foregoing document with the Clerk of the Court using CM/ECF.

Jason McCullough  
Erik Kenerson  
Nadia Moore  
Connor Mulroe

*/s/ Nayib Hassan*

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**Nayib Hassan, Esq., (Fla Bar No. 20949)  
Attorney for Defendant**