

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

CASE NO: 21-CR-175-TJK

v.

ENRIQUE TARRIO,

Defendant.

_____ /

ENRIQUE TARRIO'S MOTION TO ADOPT AND SUPPLEMENT
MOTION TO DISMISS AND FOR BILL OF PARTICULARS
FILED BY DEFENDANT NORDEAN

Enrique Tarrío, by his undersigned counsel, hereby respectfully moves for leave to adopt the Motion to Dismiss Counts One, Two, Three, Four, Five, Seven, Eight and Nine of the Third Superseding Indictment and, in the Alternative, Motion for Bill for Particulars filed by Defendant Nordean (DE 434). With respect to the Motion for Bill of Particulars, Mr. Tarrío respectfully requests that the seven particulars sought by Nordean be edited to insert Mr. Tarrío's name in place of Nordean's.

1. Mr. Tarrío seeks to join and adopt the legal arguments made and relief sought in Nordean's Motion to Dismiss and for a Bill of Particulars (DE 434).
2. Mr. Tarrío also seeks leave to supplement said motions with legal arguments and particularized facts pertinent to Mr. Tarrío, to the extent appropriate.
3. The issues raised and arguments made by Mr. Nordean apply with equal force to Mr. Tarrío.

4. Proceeding in this fashion will promote the just determination of the case, simplify procedures and eliminate unjustifiable expense and delay in accordance with Rule 2, Fed. R. Crim. Proc.

Respectfully submitted,

/s/ Nayib Hassan

**Nayib Hassan, Esq., Fla Bar No. 20949
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically noticed through the CM/ECF system to the US Attorney's Office on this 19th day of August, 2022 to the following:

Jason McCollough
Erik Kenerson
Nadia Moore
Conor Mulroe

Respectfully submitted,

/s/ Nayib Hassan

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