

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:21-cr-118 (RCL)
	)	
LISA MARIE EISENHART	)	
_____	)	

**DEFENDANT’S MOTION TO PRESERVE EVIDENCE**

NOW COMES Defendant LISA MARIE EISENHART, by and through undersigned counsel, and moves this Court for an Order directing the Government to preserve, and to instruct all agents, law enforcement officers or other officials contacted by the Government in this case, or known to possess potential evidence, to preserve any and all evidence, including rough notes (specifically including all drafts, comments or handwritten notes), reports, disbursement sheets, receipts or other tangible evidence that may be related to this case. This motion is made pursuant to *California v. Trombetta*, 467 U.S. 479 (1984); *United States v. Riley*, 189 F.3d 802, 806 (9<sup>th</sup> Cir. 1989); and 18 U.S.C. § 3500.

WHEREFORE, Defendant prays that this motion be granted.

This 6<sup>th</sup> day of March, 2023.

Respectfully submitted,

\_\_\_\_\_/s/  
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