

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

)	
UNITED STATES OF AMERICA)	
v.)	CASE NO: 1:21-CR-496
MARK IBRAHIM,)	HEARING: JUNE 30, 2022
DEFENDANT.)	
)	

MOTION FOR DISCOVERY ON SELECTIVE PROSECUTION

Pursuant to the Federal Rule of Criminal Procedure 12(b)(3)(A)(iv), *Wayte v. United States*, *United States v. Armstrong*, and the Fifth Amendment to the United States Constitution, the defense moves for discovery on the government’s selective prosecution of Mark Ibrahim following his participation in the January 6, 2021 protest in front of the Capitol. *Wayte v. United States*, 470 U.S. 598, 608 (1985); *United States v. Armstrong*, 517 U.S. 456 (1996). Specifically, Mark Ibrahim moves for discovery related to the government’s selective prosecution based on his outward expression of conservative political beliefs.

Mr. Ibrahim hereby incorporates his *Memorandum in Support of Motion for Discovery on Equal Protection Grounds for Selective Prosecution*.

Date: June 9, 2022

Respectfully submitted,
By Counsel:

/s/
Marina Medvin, Esq.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA
() UNITED STATES OF AMERICA)) V.) CASE NO: 1:21-CR-496) MARK IBRAHIM,) HEARING: JUNE 30, 2022) DEFENDANT.)

MOTION FOR DISCOVERY ON SELECTIVE PROSECUTION

Pursuant to the Federal Rule of Criminal Procedure 12(b)(3)(A)(iv), Wayte v. United States, United States v. Armstrong, and the Fifth Amendment to the United States Constitution, the defense moves for discovery on the government's selective prosecution of Mark Ibrahim following his participation in the January 6, 2021 protest in front of the Capitol. Wayte v. United States, 470 U.S. 598, 608 (1985); United States v. Armstrong, 517 U.S. 456 (1996). Specifically, Mark Ibrahim moves for discovery related to the government's selective prosecution based on his outward expression of conservative political beliefs. Mr. Ibrahim hereby incorporates his Memorandum in Support of Motion for Discovery on Equal Protection Grounds for Selective Prosecution. Date: June 9, 2022
Respectfully submitted, By Counsel: /s/ Marina Medvin, Esq. PAGE 1 / 2 Counsel for Defendant MEDVIN LAW PLC 916 Prince Street Alexandria, Virginia 22314 Tel: 888.886.4127 Email: contact@medvinlaw.com
CERTIFICATE OF SERVICE FOR CM/ECF I hereby certify that on June 9, 2022, I will electronically file the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ ECF system. I certify that all participants in the case are registered CM/ECF users, and that service will be accomplished by the CM/ECF system. /s/ Marina Medvin, Esq. PAGE 2 / 2

CERTIFICATE OF SERVICE FOR CM/ECF

I hereby certify that on June 9, 2022, I will electronically file the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ ECF system. I certify that all participants in the case are registered CM/ECF users, and that service will be accomplished by the CM/ECF system.

/s/
Marina Medvin, Esq.