

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES

v.

Ronald Balhorn

CASE NO: 1:23-cr-00114-ACR-2

**MOTION FOR DISCOVERY PURSUANT TO FED. R. CRIM.(a) OF THE FEDERAL RULES OF CRIMINAL PROCEDURE AND RULE 404(b) OF THE FEDERAL RULES OF EVIDENCE**

Defendant, Ronald Balhorn, by and through his attorneys, Mark Rollins, Rollins and Chan Law Firm, moves this Honorable Court to order the attorney for the Government to permit the Defendant to inspect, copy or photograph or to furnish copies of the following:

1. Any written or recorded statement of Defendant, or copies thereof within the possession, custody or control of the Government, the existence of which is known or by the exercise of due diligence may become known, to the attorney for the Government, as required under Fed. R. Crim. P. 16

2. The substance of any oral statement which the government intends to offer in evidence at trial made by Defendant, whether before or after arrest and in response to interrogation by any person known to the Defendant to be a Government agent, as required by Fed. R. Crim.(a)(1)(A).

3. A copy of Defendant's prior criminal record, if any, within the possession, custody or control of the Government, the existence of which is known, to the attorney for the Government, as required by Fed. R. Crim.(a)(1)(B).

4. All books, papers, documents, photographs, tangible objects, or copies or portions thereof, which are within the possession, custody or control of the Government and which are material to the preparation of Defendant's defense or intended for use by the Government as evidence at trial or were obtained or belong to Defendant, as required by Fed. R. Crim.(a)(1)(C).

5. Results and reports of physical or mental examinations and of scientific tests and experiments, or copies thereof, which are within the possession custody or control of the Government, or the existence of which are known, or by the exercise of due diligence may become known, to the attorney for the Government, and which are material to the preparation of Defendant's defense herein or are intended for use by the Government as evidence in its case-in- chief at trial as required by Fed. R. Crim.(a)(1)(D).

6. Any evidence of other crimes, wrongs, or acts the government intends to introduce at the trial of this matter in accordance with Federal Rule of Evidence 404(b).

**MEMORANDUM OF POINTS AND AUTHORITIES  
IN SUPPORT OF MOTION FOR DISCOVERY**

1. Fed. R. Crim. P. 16
2. LCrR 16.1

WHEREFORE, the Defendant requests as follows:

1. That the Court enter an order requiring the Government to turn over discovery if, after the parties confer, they are unable to resolve

discovery disputes; and

2. For such other and further relief as this Court may deem just and proper.

Respectfully submitted,  
ROLLINS AND CHAN

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**Date Filed:** April 13, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2023 this motion was electronically filed pursuant to the rules of the Court.

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Mark Rollins