

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-00439-EGS
	:	
DAVID JOHN LESPERANCE,	:	
	:	
Defendant.	:	

**NOTICE UNDER LOCAL CRIMINAL RULE 57.12B3 OF RELATED CASES
AND INTENT TO SUPERSEDE INFORMATION**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files notice, pursuant to Local Criminal Rule 57.12b3, that *United States v. Casey Cusick*, No. 21-CR-00440-CJN, *United States v. James Varnell Cusick Jr*, No. 21-CR-00441-RDM, and *United States v. David John Lesperance*, No. 21-CR-00439-EGS, are related cases.

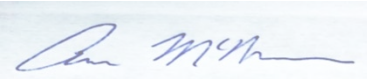
All three defendants are charged with the same four misdemeanor counts related to their conduct at the United States Capitol Building on January 6, 2021. The defendants all know each other and traveled from Florida to the District of Columbia in advance of January 6, 2021. All three defendants entered and exited the Capitol Building at roughly the same time, in roughly the same locations. Accordingly, because the primary criminal conduct alleged against these three defendants overlaps both temporally and geographically, and the evidence against them will be mutually admissible, including witness testimony and electronic evidence obtained from an iCloud account belonging to one of the defendants, the government is preparing to charge the three defendants in a single information and to present evidence against them in a single trial.

The government does not expect to add further defendants, or charges, to this case. Moreover, prior to filing the instant notice, the government and defense counsel John Pierce, Esq.,

discussed the proposed consolidation, and the United States is authorized to represent to the Court that Defendant does not oppose this notice.

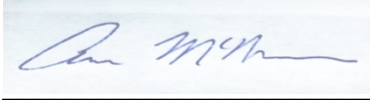
Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY
D.C. Bar No. 415793

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2021, I caused a copy of the foregoing notice to be served on counsel of record via electronic filing.

By: 
ANNE P. MCNAMARA
Assistant United States Attorney