

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Case No. 21-cr-178 (APM)
	:	
v.	:	
	:	
PETER SCHWARTZ, et al.,	:	
	:	
Defendants.	:	

JOINT PRETRIAL STATEMENT

As directed in the Court's March 16, 2022 Amended Pretrial Order, the parties, by and through the United States Attorney for the District of Columbia, and counsel for defendants Peter Schwartz, Jeffrey Brown, and Markus Maly, submit this Joint Pretrial Statement in advance of the trial currently set for November 1, 2022.

This statement contains the following items:

1. Neutral statement of the case, attached as Exhibit 1: agreed to by all parties
2. Proposed voir dire questions, attached as Exhibit 2: agreed to by all parties
3. Proposed jury instructions, attached as Exhibit 3: agreed to by all parties
4. Government's witness list, attached as Exhibit 4: submitted only by the government, and subject to change.
5. Government's exhibit list, attached as Exhibit 5: submitted only by the government, and subject to change.
6. Stipulations, attached as Exhibit 6: agreed to by all parties. The parties will introduce signed versions of the stipulations as exhibits during the course of trial.
7. Proposed verdict form for defendant Peter Schwartz, attached as Exhibit 7: agreed to by both parties.
8. Proposed verdict form for defendant Jeffrey Brown, attached as Exhibit 8: agreed to by both parties.

9. Proposed verdict form for defendant Markus Maly, attached as Exhibit 9: agreed to by both parties.

Respectfully submitted,

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