

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 1:21-cr-00421-JDB

JOHN MARON NASSIF

---

UNOPPOSED MOTION TO SUPPLEMENT DEFENDANT'S MOTION FOR TRANSFER OF  
VENUE OR, IN THE ALTERNATIVE, TO ALLOW EXPANDED EXAMINATION OF  
PROSPECTIVE JURORS BEFORE AND DURING VOIR DIRE (DOC. 31)

The Defendant, John Marion Nassif, by and through his undersigned attorney, moves this Honorable Court to allow him to supplement his *Motion for Transfer of Venue or, in the Alternative, to Allow Expanded Examination of Prospective Jurors Before and During Voir Dire* filed at docket entry 31. As grounds in support thereof, the undersigned would state the following:

1. On June 21, 2022, the undersigned filed a *Motion for Transfer of Venue or, in the Alternative, to Allow Expanded Examination of Prospective Jurors Before and During Voir Dire*. Doc. 31. Said motion contained an attachment relating to the change of venue issue raised in the motion. The attachment that undersigned intended to file was a report from Select Litigation, a company that the Federal Defenders Office in the Eastern District of Virginia had hired to assess the federal jury pool in the District of Columbia and to provide an analysis regarding the change of venue issue. The Select Litigation Report also contained two separate Appendix's (Appendix "A" and Appendix "B").

2. The undersigned discovered after filing said motion that the complete Select Litigation Report had not been filed with undersigned's motion. Rather, only Appendix "B" of said report was attached and filed with undersigned's motion. Accordingly, the undersigned moves this Court to allow him to supplement his *Motion for Transfer of Venue or, in the Alternative, to Allow Expanded Examination of Prospective Jurors Before and During Voir Dire* with the complete Select Litigation Report that he had intended to file. *See attached.*

3. That the undersigned has discussed this matter with government counsel, who has indicated she does not oppose supplementing the original motion with the complete Select Litigation report, which is attached hereto.

Wherefore, the undersigned respectfully request that this Honorable Court allow him to supplement his *Motion for Transfer of Venue or, in the Alternative, to Allow Expanded Examination of Prospective Jurors Before and During Voir Dire* with the complete Select Litigation Report relating to the change of venue issue.

Respectfully submitted,

A. Fitzgerald Hall, Esq.  
Federal Defender, MDFL

/s/ James T. Skuthan  
James T. Skuthan, Esq.  
First Assistant Federal Defender  
Florida Bar Number 0544124  
201 South Orange Avenue, Ste 300  
Orlando, Florida 32801  
Telephone 407-648-6760  
E-Mail: jim\_skuthan@fd.org  
Counsel for the Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2022, I electronically filed the foregoing via this Court's CM/ECF system, which will send notice of such filing to all counsel of record.

*/s/ James T. Skuthan* \_\_\_\_\_  
James T. Skuthan, Esq.  
Attorney for Defendant