

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

UNITED STATES OF AMERICA,

-v-

WILLIAM PEPE,

Defendant.

Case No. 1:21-cr-000052 (TJK)

**DEFENDANT WILLIAM PEPE'S MOTION TO TRANSFER**

The accused, William Pepe (Mr. Pepe), by and through his counsel, tenders this motion to transfer this case from the District of Columbia to a district outside of Washington D.C. Counsel submits this Court should consider the merits of this motion, but that the designation of the district to which the case is transferred should be determined by the Chief Judge of the Court of Appeals for the District of Columbia Circuit based on where the defendant resides. This motion is submitted under the ambit of Rule 21(a), Fed. R. Crim.P. In accordance with Local Rule 14(F), a brief in support is being submitted simultaneously with this motion and a proposed order granting the relief requested is also tendered.

Dated: May 11, 2021

Respectfully Submitted,

**PIERCE BAINBRIDGE P.C.**



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**CERTIFICATE OF SERVICE**

I hereby certify that, on May 11, 2021 that the foregoing document was filed with the Court's CM/ECF system which will provide notice on all counsel deemed to have consented to electronic service. All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing document by mail on this date.

/s/ John M. Pierce  
John M. Pierce