

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

CASE NO. 1:21-CR-00421-JDB

JOHN MARON NASSIF,

DEFENDANT.

REQUEST FOR OFFENSE INSTRUCTIONS

The Defendant, by and through his undersigned attorney, moves this Honorable Court to enter its order using the following offense instructions in determining the verdict in the four alleged offenses contained in the Information. Doc. 12. As grounds in support thereof, the Defendant would state the following:

The government has proposed offense instructions for the counts charged. *See* Doc. 60 pages 7 to 10.

The undersigned understands this is a non-jury trial and that the Court is well aware of the elements of each offense charged. However, to ensure consistency with similar cases charged in the District, the undersigned would request that this Court adopt and use the offense instructions recently used by the Honorable Tanya S. Chutkan, United States District Judge, in the case of *United States v. Russell Alford* (1:21-cr-263-TSC).

In the *Alford* case, the defendant was charged with the same four misdemeanors that Mr. Nassif is charged with in the above styled case.

The District Court considered proposed offense instructions from both parties and gave the Final Jury and Offense Instructions to the jury. There is no docket number assigned to the “Final Offense and Jury Instructions” from that case, so a copy is attached hereto. See attached copy of “Final Jury and Offense Instructions”. Pages 10-14.

Respectfully submitted,

A. Fitzgerald Hall
Federal Defender, MDFL

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CERTIFICATE OF SERVICE

I hereby certify that on November 30, 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