

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

DOMINIC PEZZOLA,

*Defendant.*

No. 1:21-cr-175 (TJK)

**DEFENDANT PEZZOLA'S JOINDER WITH REHL'S MOTION TO INSPECT AND  
EXAMINE THE RELEVANT CELL PHONE DEVICES**

Dominic Pezzola, by his undersigned counsel, respectfully joins codefendant Rehl's oral motions made on Feb.6 (and extended at other times and dates by Rehl's counsel Ms. Hernandez) to personally inspect and examine certain cell phone devices at issue in this case.

Ms. Hernandez (on behalf of Rehl) has proffered that experts she has consulted have indicated some of the Telegram chat displays being offered in slides by the government are mis-representing the true nature and circumstances of the chats in question. Counsel for codefendant Tarrío have also raised the same point. Moreover, codefendant Tarrío's counsel, on cross-examination of government's witness Cain, has brought out the fact that the Telegram displays used by the government in this case may not reflect the actual chats as experienced and seen by users such as Rehl, Tarrío, and others.

Defendant Pezzola is not particularly tech savvy. (Nor are his counselors.) However we request, upon the most basic rules of evidence, that the phones allegedly linked to or belonging to co-defendants be brought into court and made available for co-defendants to open and inspect.

Dated: February 8, 2023,

Respectfully Submitted,  
/s/ Roger I. Roots, esq.  
Roger I. Roots  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on February 8, 2023, this motion and the accompany declaration was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ Roger I. Roots  
Roger I. Roots