

UNITED STATES DISTRICT  
COURT FOR THE  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	1:21-cr-00175 (TJK)
	:	
v.	:	
	:	
ETHAN NORDEAN, et al.	:	SEPTEMBER 6, 2023

**NOTICE OF FILING GOVERNMENT’S PLEA OFFERS OF OCTOBER 21, 2022**

Defendants’ Joseph Biggs and Zachary Rehl herewith tender notice of their filing of a plea letter from the United States Government directed to the defendants on October 21, 2022. In that letter, the Government offered the defendants sentences materially less than it sought after trial. The defendants file this letter to make it part of the record in order to preserve a claim that the Government’s demand for sentences far in excess of the plea offer, and its pursuit of a terrorism enhancement, after trial is a “trial tax” imposed in violation of the Sixth Amendment. In effect, the defendants were punished because they demanded their right to trial.

By: /s/ NORMAN A. PATTIS /s/  
NORMAN A. PATTIS  
PATTIS & SMITH, LLC  
383 Orange Street  
New Haven, CT  
06511  
Ct13120  
T: 203.393.3017  
F: 203.393.9745  
[npattis@pattisandsmith.com](mailto:npattis@pattisandsmith.com)

**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that, on the above-captioned date, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties of record by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

/s/ NORMAN A. PATTIS /s/  
NORMAN A. PATTIS