

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BRUNO JOSEPH CUA

Criminal Action No. 21-00107 (RDM)

**MOTION TO ADOPT, CONFORM, AND SUPPLEMENT MOTIONS  
AND BRIEFS TO DISMISS COUNTS ALLEGING VIOLATION OF  
18 U.S.C. § 1512(C)(2) IN OTHER CASES AS APPLICABLE TO  
COUNT 2 OF THE SECOND SUPERSEDING INDICTMENT**

Bruno Joseph Cua, through undersigned counsel, respectfully requests that he be permitted to adopt, conform, and have the benefit of certain motions, objections, responses, replies, other briefs, and supporting arguments filed and presented by other defendants before this Court to dismiss counts alleging violations of 18 U.S.C. § 1512(c)(2), as applicable to Count 2 of the second superseding indictment against Mr. Cua. *See* ECF No. 90 at 2. Mr. Cua incorporates by reference the motion filed previously at ECF No. 84 in this case, which in turn requests to adopt, conform, and have the benefit of prior papers and argument filed with and presented to this court in other cases regarding dismissal of counts alleging violation of section 1512(c)(2). In other words, Mr. Cua seeks to transfer and apply his prior motion and arguments therein, which technically addressed the first superseding indictment, to his second superseding indictment.

Respectfully submitted,

DATED: December 7, 2021

/s/ William E. Zapf  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of December 2021, I filed the foregoing with the Clerk of the United States District Court for the District of Columbia by using the CM/ECF system, which system I understand has provided electronic notice counsel of record.

Dated: December 7, 2021

*/s/ William E. Zapf* \_\_\_\_\_

William E. Zapf