

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

UNITED STATES OF AMERICA

v.

**ZACHARY REHL,
Defendant**

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CASE NO: 1:21-cr-0715-3 (APM)

**ZACHARY REHL'S MOTION TO ADOPT AND SUPPLEMENT
MOTIONS OF CODEFENDANTS**

Zachary Rehl, by his undersigned counsel, hereby respectfully moves to join and adopt the legal arguments made and relief sought in the following motions and replies filed by codefendants:

1. Nordean's First Omnibus Motion in Limine to Exclude Proposed Government Exhibits (ECF 489)
2. Nordean's Motion in Limine to Exclude the Government's Proposed Expert Witness Testimony of Oren Segal (ECF 490)
3. Tarrío's Motion in Limine to Exclude/limit/or Modify Government's Proposed Exhibits (ECF 491)
4. Nordean's Opposition to the Government's Motion in Limine to Admit Statements and Nordean's Motion to Direct the Government to Identify Co-conspirator Statements (ECF 499)
5. Nordean's Opposition to the Government's Omnibus Motion in Limine (ECF 505).
6. Nordean's Joint Motion to Dismiss Counts One, Two and Four under the Sixth Amendment Vicinage Clause and Supplement to Their Motion to Change Venue (518)
7. Nordean's Reply to the Government's Opposition to His First Omnibus Motion in Limine to Exclude Proposed Government Exhibits (ECF 524)
8. Nordean's Motion to Join Defendant Rehl's Motion to Dismiss the Indictment and for Sanctions as a Result of Brady Violations (ECF 535)

9. Tarrío's Motion to Join Defendant Rehl's Motion to Dismiss the Indictment and for Sanctions as a Result of Brady Violations (ECF 536)

10. Nordean's Reply to the Government's Opposition to Defendants' Motion to Dismiss the Indictment on Account of Brady Violations (ECF 539)

11. Mr. Rehl also seeks leave to supplement said motions with legal arguments and particularized facts pertinent to Mr. Rehl, to the extent issues arise during any hearing in the matter, additional evidence is produced by the government or uncovered by the defense, or justice requires.

12. The issues raised and arguments made in the noted motions and reply memoranda apply with equal force to Mr. Rehl.

13. Proceeding in this fashion will promote the just determination of the case, simplify procedures and eliminate unjustifiable expense and delay in accordance with Rule 2, FED. R. CRIM. PROC.

WHEREFORE, for the reasons stated above, Mr. Rehl respectfully moves to adopt and join the Motions filed by his codefendants and to supplement said motions with particularized facts and arguments pertinent to Mr. Rehl, to the extent issues arise during any hearing in the matter, additional evidence is produced by the government or uncovered by the defense, or justice requires.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served via ECF on all counsel of record this 17th day of November, 2022.

/s/ Carmen D. Hernandez

Carmen D. Hernandez