

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

UNITED STATES OF AMERICA)	Docket No. 1:21-cr-00195
)	
)	
v.)	ELECTRONICALLY FILED
)	
)	
DEBORAH SANDOVAL)	The Honorable Thomas F. Hogan
SALVADOR SANDOVAL, JR.,)	
Defendant.)	

**MOTION TO COMPEL DISCLOSURE OF PLEA BARGAINS,
PREFERENTIAL TREATMENT, AND PROMISES TO
GOVERNMENT WITNESSES WITH CITATION OF AUTHORITIES**

AND NOW, to-wit, comes Defendant, Deborah Sandoval, (hereinafter “Ms. Sandoval”), by and through her attorney, Komron Jon Maknoon, Esquire, and respectfully moves this Honorable Court to enter an Order compelling the Government to disclose plea bargains, preferential treatment, and promises of any nature to Government witnesses and, in support thereof, avers as follows:

1. On March 9, 2021, Ms. Sandoval was indicted on alleged violations of 18 U.S.C. § 1512(c)(2) and 2 – Obstruction of an Official Proceeding and Aiding and Abetting, 18 U.S.C. § 1752(a)(1) – Entering and Remaining in a Restricted Building or Grounds, 18 U.S.C. § 1752(a)(2) – Disorderly and Disruptive Conduct in a Restricted Building or Grounds, 40 U.S.C. § 5104(e)(2)(D) – Disorderly Conduct in a Capital Building, and §40 U.S.C. § 5104(e)(2)(G) – Parading, Demonstrating, or Picketing in a Capital Building (*See* ECF Doc. No. 19).

2. Ms. Sandoval was subsequently charged by a superseding indictment on December 17, 2021, with violating the same sections with the exception of 18 U.S.C. § 1512(c)(2) and 2 – Obstruction of an Official Proceeding and Aiding and Abetting (*See* ECF Doc. No.38).

3. On March 16, 2022, undersigned counsel respectfully entered his appearance on behalf of Ms. Sandoval (*See* ECF Doc. No. 54).

4. Ms. Sandoval believes and therefore avers that the Government may call as witnesses at the trial of this case various persons, including cooperating witnesses, confidential informants, and unindicted or indicted co-conspirators with whom it has entered into plea bargains or arrangements or has otherwise given preferential treatment or extended promises of leniency of various kinds in order for their assistance or testimony in this and/or other cases.

5. Ms. Sandoval seeks disclosure of the names of all witnesses with whom the Government has entered into such bargains or has otherwise given preferential treatment or extended promises of any kind in return for their assistance or testimony in this case, as well as full and complete statement of the nature and extent of any such bargain, preferential treatment, or promises. The prosecution has a duty to disclose this evidence prior to trial. *United States v. Giglio*, 405 U.S. 150 (1972); *Brady v. Maryland*, 373 U.S. 83 (1963); *In re Sealed Case No. 99-3096 (Brady Obligations)*, 185 F.3d 887 (D.C. Cir. 1999).

WHEREFORE, Ms. Sandoval respectfully requests this Honorable Court enter an Order directing the Government to disclose the names of all witnesses with whom the Government has entered bargains or extended preferential treatment in return for their assistance or testimony in this case and/or other cases as well as the nature and extent of such bargain, preferential treatment, or promises.

Respectfully submitted,

s/ *Komron Jon Maknoon*

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