

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

UNITED STATES OF AMERICA

v.

**CYNTHIA BALLENGER and
CHRISTOPHER PRICE,**

Defendants.

Case No. 1:21-cr-00719 (JEB)

DEFENDANTS' MOTION FOR TRANSFER OF VENUE

Comes now Defendant Cynthia Ballenger (Cynthia Price) and Defendant Christopher Price, (together Defendants or the Prices) by and through undersigned counsel, and pursuant to Federal Rule of Criminal Procedure 21(a), respectfully requests that this Court transfer venue in this case based on the arguments in the accompanying memorandum. In the alternative, the Prices would move the Court to permit expanded examination of prospective jurors before and during formal voir dire. As to the latter, alternative request, the Prices specifically would ask:

- (1) that the defense be allowed to prepare a questionnaire that, after review and approval by the court, would be distributed to summoned prospective jurors to return before trial;
- (2) that the parties be present for any pre-screening questioning of prospective jurors that the Court conducts before the beginning of formal voir dire; and
- (3) that the parties be permitted to question jurors during voir dire.

Also, in the alternative the Prices ask the Court to consider other relief as may address the Fifth and Sixth Amendment concerns raised by the Prices during the continuing judicial process.

WHEREFORE, for the foregoing reasons, the Prices respectfully request that the Court grant this motion. The motion is supported by the accompanying memorandum of points and authorities in support of this motion.

Dated: July 20, 2022

Respectfully submitted,

/s/ Nandan Kenkeremath

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