

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

CASE NO: 21-CR-175-TJK

v.

ENRIQUE TARRIO,

Defendant.

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**DEFENDANT TARRIO'S MOTION TO JOIN DEFENDANT REHL'S  
MOTION TO DISMISS THE INDICTMENT AND FOR SANCTIONS AS A  
RESULT OF BRADY VIOLATIONS**

Defendant Tarrío, through his counsel, moves the Court to join the Motion to Dismiss the Indictment and for Sanctions filed by Defendant Rehl. ECF. Nos. 533,534 (sealed). Tarrío submits this filing to add the following additional points and argument.

On November 7, 2022 undersigned and co-counsel were finally able to review the production of CHS materials. The production was substantial with over 500+ pages of materials. Unfortunately, the production contains significant redactions. Puzzlingly, even the page numbers are redacted from the statements. As detailed in the motions filed by Defendants Rehl and Nordean, there are significant portions of the materials favorable to all Defendants, but even more so to Tarrío's defense.

The timing of this disclosure is extremely troubling considering events that have transpired in this case. Based on the review of these materials, and considering all the redactions throughout, there is no legitimate reason that these documents could not have been provided in the normal discovery production channels. Further, for Defense counsel to have to review the documents in this cumbersome manner greatly prejudices the Defense. The Defense requires unredacted copies of these documents to render effective assistance of counsel.

WHEREFORE, for the reasons stated above, Tarrío joins Rehl's motion to dismiss the Indictment and impose such other sanctions as will perverse the rights of all Defendants to a fair trial and to the due process of law.

Respectfully submitted,

***BY: /s/ Sabino Jauregui, Esq.***

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was electronically noticed through the CM/ECF system to the US Attorney's Office on this 11<sup>th</sup> day of November, 2022 to the following:

Jason McCollough  
Luke Jones  
Erik Kenerson  
Nadia Moore

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