

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Criminal Division – Felony Branch

UNITED STATES OF AMERICA	:	
	:	Case No. 2009 CF1 9230
v.	:	Judge Robert E. Morin
	:	Status: May 19, 2016
INGMAR GUANDIQUE	:	

MOTION FOR DEPOSITIONS AND SUPPLEMENTAL NOTICE

Mr. Guandique, through counsel, respectfully submits this motion for depositions and supplemental notice (and Part II of the Supplemental Notice, submitted separately for filing under seal), which addresses concerns raised by the Court and the government's opposition to the proposed depositions. First, as demonstrated below, the witnesses have relevant testimony to provide regarding the key question in this case: who killed Chandra Levy? The witnesses' testimony will support the defense and contradict the government's theory. Second, the witnesses are unavailable or are likely to be unavailable for trial due to a variety of circumstances. Failure to depose the witnesses may mean that jury will never hear their testimony. The names, addresses, and – in some cases – the details of the medical issues relating to the witnesses are provided in Part II of the Supplemental Notice which counsel is submitting separately for filing under seal. Third, the government need not spend a penny on travel expenses and the depositions will, in fact, result in the Court saving resources. Finally, the government's complaint about Jencks material is unfounded. In fact, many of the witnesses' statements to the FBI and MPD were suppressed *by the government* before and during the first trial, and the government is still in possession of these statements. For the reasons stated in this motion, Mr. Guandique respectfully requests that the Court order depositions of the four witnesses pursuant to Superior Court Rule of Criminal Procedure 15.

GARY CONDIT

The witnesses the defense seeks to depose all have information regarding Gary Condit, and the relevance of their expected testimony is clear. The government's chief argument is that the noticed witnesses did not know Chandra Levy or Mr. Guandique. But they all know a main suspect in this case: Gary Condit.

The government's actions at the first trial demonstrate that Mr. Condit was a legitimate suspect in this case. The government called Mr. Condit as a witness during the prosecution's case-in-chief in order to elicit his denial of any involvement in Ms. Levy's disappearance and death, and to elicit his alibi defense. The prosecutors made representations about Mr. Condit's connection to the case in opening statement, closing argument, and rebuttal argument. The government also argued that the police department and the FBI bungled the initial investigation because they were focused – mistakenly, the government claimed – on Mr. Condit. The government cannot reasonably argue now that evidence regarding Mr. Condit's involvement in this case is irrelevant.

At the time of Chandra Levy's disappearance, Mr. Condit had a powerful motive to either kill Levy and/or cover-up the circumstances of her death, whether her death was intentional or accidental. As DNA and serological evidence conclusively establish, Mr. Condit was having an affair with Ms. Levy: Mr. Condit's DNA, in the form of sperm, was located on Ms. Levy's underwear (the government sought unsuccessfully to keep this evidence from the jury at the first trial, even after the government called Mr. Condit to testify about his relationship with Ms. Levy). Even if the intimate relationship between Mr. Condit and Ms. Levy were an ordinary one, the existence of the relationship alone might make Mr. Condit a suspect, given that "two-

thirds of violent attacks against women are committed by someone the woman knows” and “1,500 women are killed each year by husbands or boyfriends.” See www.pbs.org/kued/nosafeplace/studyg/domestic.html. “Females are generally murdered by people they know,” according to a 2007 study published by the Department of Justice Bureau of Justice Statistics. *Female Victims of Violence*, Shannan Catalano, Ph.D, et al., September 2009, NCJ 228356 at 3. Furthermore, the Department of Justice study showed, of the people they know, women are most likely to be killed by “intimates,” *i.e.* husbands or boyfriends. *Id.* Indeed, because of the frequency with which women are killed by their husbands and boyfriends, police routinely focus on romantic partners as possible suspects in homicide investigations involving female victims.

Mr. Condit, of course, was more than just the average boyfriend: he was a married man having an affair with a woman half his age. Not only was he married, but he was powerful man with a high-profile career as a member of the House of Representatives. At the time Ms. Levy disappeared, Mr. Condit was frequently in the news because he was one of the few Democratic congressmen to support the nascent and controversial presidency of George W. Bush. Mr. Condit, a representative of a culturally conservative district in California, had previously made news for supporting the impeachment inquiry related to President Bill Clinton’s affair with intern Monica Lewinsky. Mr. Condit was a man of ambition, and with the President Clinton scandal fresh in his mind, Mr. Condit was fully aware of the cost he could pay if his affair with Ms. Levy became public. He therefore had an obvious motive to kill Ms. Levy in order to keep the relationship a secret, and an equally powerful motive to cover-up the circumstances of her death if she died while she was with him – either through his intentional conduct or otherwise.

Mr. Condit was also inferentially aware of Ms. Levy's whereabouts at the time of her disappearance. According to police and FBI interviews, Mr. Condit ultimately admitted that they saw each other often, and phone records and voicemail messages demonstrated that they communicated by phone frequently around the time of Ms. Levy's disappearance. Mr. Condit was in Washington, D.C., and not incarcerated at the time of Ms. Levy's disappearance. Mr. Condit's apartment – just steps from trails that lead into Rock Creek Park – was less than three miles from where Ms. Levy's remains were located. See *Johnson v. United States*, 2016 WL 1536221 at 4 (D.C. 2016) (evidence of a third-party perpetrator's motive admissible with a proffer of practical opportunity: the third party had "at least inferential knowledge of the victim's whereabouts and was not incarcerated or otherwise physically unable to commit the crime; proof actually placing the third party at or near the crime scene is not required").¹ Forensic testing on swabs taken from inside Mr. Condit's apartment revealed "presumptive" blood.

Mr. Condit's behavior after Ms. Levy's disappearance also demonstrated consciousness of guilt. Mr. Condit attempted to dispose of evidence in advance of a police search of his apartment. Mr. Condit was forewarned that the police were going to search his apartment, and just a few hours before the search he was observed by an eyewitness stuffing a watch box into a trash can in Alexandria, Virginia. The eyewitness's account was corroborated by video footage and physical evidence.

Mr. Condit also repeatedly misrepresented and downplayed the true extent of his relationship with Ms. Levy. When he was asked directly by Ms. Levy's mother in the early days of the search, Mr. Condit denied having an affair with Ms. Levy. In interviews with law

¹ The government has claimed that Mr. Condit was "eliminated as a suspect," but none of the discovery provided to the defense explains why that would be so. The government has refused to provide any documentation explaining why – or even when – it ended its consideration of Mr. Condit as a suspect.

enforcement, Mr. Condit repeatedly misrepresented the nature and extent of his relationship with Ms. Levy, when he was not refusing to answer their questions. Even after other evidence and witnesses established the relationship, Mr. Condit continued to minimize the true nature of the relationship.

Mr. Condit refused to submit to an FBI-administered polygraph examination – like the FBI-administered polygraph test to which Mr. Guandique voluntarily submitted and passed. See IG 3577-78 (FBI polygraph report finding Mr. Guandique “not deceptive” when stating he was not involved in the disappearance of Chandra Levy). Instead, Mr. Condit hired his own polygrapher and claimed to have passed, but the results he provided to law enforcement were decried as “useless” and “not credible” by then-Chief of Police, Charles H. Ramsey, because *inter alia* the graph results were not linked to the questions asked. Stephen Braun and Robert L. Jackson, “FBI Won’t Validate Condit Test,” THE LOS ANGELES TIMES, July 21, 2001. Discovery provided to the defense in 2016 indicates that some within the FBI also believed the polygrapher Mr. Condit hired “had problems with his credibility.” IGRT_FBI_3418.

When he was called as witness before a grand jury in 2002, Mr. Condit refused to answer any substantive questions on the grounds that his answers might incriminate him. Mr. Condit testified in 2010 – on direct examination by the prosecutor – that he asserted his Fifth Amendment rights in 2002 because the prosecutor in charge of the case at the time (different from the prosecutors who brought the case to trial in 2010) “was there to do whatever he could do to trick me or just cause me pain and anguish.” Tr. 11/1/10 A at 112. There is no evidence that the federal prosecutor in charge of the case in 2002 was seeking to “trick” Mr. Condit or cause him “pain and anguish.” In its rebuttal argument, contrary to Condit’s testimony, the government explained that Mr. Condit asserted his right against self-incrimination because his

semen had been found on Ms. Levy's underwear. Tr. 11/16/10 at 129-30 ("Government's Exhibit 61, the panties were testedThis is the reason Mr. Condit took the Fifth and didn't want to answer any questions about Ms. Levy or anything else in the grand jury.")).

When he was called as a prosecution witness in 2010, Mr. Condit still refused to answer questions about the nature of his relationship with Ms. Levy. Tr. 11/1/10 A at 89-90, 123; Tr. 11/1/10 B at 14-16. Even when specifically ordered by Judge Fisher, "*You have to answer the question* [whether you had an intimate relationship with Levy]," Mr. Condit refused to answer on grounds of "personal privacy" and "out of principle." Tr. 11/1/10 A at 123 (emphasis added).

Mr. Condit insisted later in his testimony that he and Ms. Levy were only "friends," with "no relationship to end," and that it was "the full truth" that "she was a constituent and a friend of mine." Tr. 11/1/10 A at 126; Tr. 11/1/10 B at 9-10. Consistent with his characterization of the relationship as *de minimis*, Mr. Condit testified that he "made no attempt to keep anything secret," that she only "came by" his apartment "a few times," and that they never had a disagreement. Tr. 11/1/10 B at 36-37. Other evidence, however – some of which was disclosed for the first time after the 2010 trial – reveals that in fact Ms. Levy frequently spent the night at Mr. Condit's apartment and was required by Mr. Condit to keep their relationship secret.

Mr. Condit's relationship with Ms. Levy, his powerful motive to keep that relationship a secret at all costs, his knowledge of Ms. Levy's whereabouts and practical opportunity to commit the crime, his demonstrated consciousness of guilt by seeking to hide evidence and refusing to answer police questions, make the testimony of the four deposition witnesses relevant.

While, as demonstrated below, the deposition witnesses' testimony is "material" – under any definition of that term – the government incorrectly suggests that a relatively high burden of "material" testimony is "required" by Rule 15. The Federal version of Rule 15 – which the

Superior Court Rule follows in this respect – was amended in 1975 to eliminate the requirement that the witness’s testimony be “material.” Whether the testimony would be helpful to the party seeking a deposition, however, remains a consideration in the trial court’s exercise of discretion. A higher burden of “materiality,” such as that employed in the appellate *Brady* context, requiring “a reasonable probability” that the exculpatory evidence could have affected the outcome, makes no sense and has no place in the pre-trial Rule 15 context. Requiring the parties to argue and the Court to determine how much impact proffered testimony might have on a trial that has not happened yet would be a completely unworkable standard. Rule 16 “materiality” – which includes both inadmissible documents and evidence that is unfavorable to the defense – also does not make sense in the Criminal Rule 15 deposition context. Instead, the key concern of Rule 15’s “interests of justice” requirement is that the deposition should serve to secure testimony helpful to the party seeking the deposition, rather than as a vehicle for discovery of the other party’s case. *Compare* Superior Court Rule of Criminal Procedure 17(b)(2) (requiring, for certain defense subpoenas, an *ex parte* application showing that the presence of the witness is “necessary to an adequate defense”). Here, the anticipated testimony of the witnesses for whom the defense seeks depositions is favorable to the defense, and unfavorable to the government. The government will not be calling any of these witnesses in its case.

W-1

W-1’s anticipated testimony will provide circumstantial evidence of a link between Gary Condit and Chandra Levy’s death. W-1 had a sexual relationship with Mr. Condit in 2001, during the same period of time that Condit had a relationship with Ms. Levy.

The government alleges that Ms. Levy’s tights were found near her body in Rock Creek Park, and that each leg of the tights was tied in a knot. The government argued at the first trial

that the killer used the knots in the tights to restrain Ms. Levy. According to FBI notes of an interview with W-1, Mr. Condit – only a few months before Levy disappeared – engaged in aggressive sex and scared W-1 by demonstrating a desire to tie up W-1 with items of clothing.

The FBI agent's notes of the W-1 interview, which were not disclosed to defense prior to the first trial, state the following:

Last at house. Felt scared – end of March 2001. Into a thing about doing a thing w/ another guy. Called her said how about tonight – she was out – he said he had a couple other guys who can come over [and] interested – he said he would get some alcohol. He called later – said I'm home – we're ready – she said ok – she thought maybe joking. 1 ½ later (sic) she was late – he said they left. He said he thought you'd be scared [and] cry. Found vodka – in cabinet. Next morning – she saw neck ties under bed – tied to bed. She asked are you sleeping [with] someone else. He said they were for her. She got scared thinking about if they were for her [with] the other guys. Then aggressive sex.

FBI 1A Sec.003 at 662-663.² If consistent with her FBI interview, W-1's testimony in this regard would provide a link between Mr. Condit and the evidence near Ms. Levy's body: Mr. Condit's desire to engage in aggressive sex and tie a woman up and the knots in what the government alleges were Ms. Levy's tights found with her remains. Aggressive sex involving bondage is not an entirely safe activity, and Mr. Condit would have had a powerful motive to dispose of Ms. Levy's remains – and her tights that had been tied in knots – if she died during sexual activity with Mr. Condit.

W-1's testimony would also provide evidence of Mr. Condit's consciousness of guilt after Ms. Levy disappeared. On May 11, 2001, approximately 10 days after Ms. Levy disappeared, W-1 received an unusual call from Mr. Condit. Mr. Condit told W-1 he was “gonna have to disappear” because he was “in trouble.” FBI 1A Sec.003 at 667. Pressed for more information, Condit said he could not tell her why he “might be in trouble.” *Id.* Six days later

² Mr. Condit did not drink alcohol. The reference to purchasing alcohol and the presence of vodka in the apartment therefore would have been notable to W-1.

Mr. Condit called W-1 from Luray, Virginia, about 90 miles south and west of Washington, D.C. The number for that call, including the Luray, Virginia, area code, was on W-1's caller I.D.

W-1's testimony will provide further proof that Mr. Condit acted with a guilty conscience and sought to obstruct the FBI's investigation. In June of 2001, Mr. Condit, through an attorney, sought to have W-1 sign a false and perjurious affidavit that she did not have a romantic relationship with Mr. Condit and was only "acquainted" with him. After W-1 refused to sign the affidavit because it was false, Mr. Condit himself made repeated efforts to convince W-1 to sign the false affidavit.

W-1's testimony regarding Mr. Condit's attempts to suborn perjury is also evidence of Mr. Condit's corruption bias. The defense is entitled to present extrinsic testimony of the corruption bias of government witnesses.

The government's argument that W-1's "relationship [with Mr. Condit] is not relevant" is wrong, for the reasons explained above. The government's efforts to discredit W-1 – because she did not initially reveal all about Mr. Condit and later felt compelled to give press interviews because she was, as one police report documents, "in fear [for] her life," IGRT_WACIIS_87 – are both meritless and irrelevant. The government's attacks on W-1 relate, at best, to the weight of her testimony, not its relevance.

FBI Special Agent Robert A. Oxley took the notes regarding bondage, W-1's fear of Mr. Condit, and aggressive sex during an interview with W-1 on July 11, 2001. FBI 1A Sec.003 at 656-657. The notes were not disclosed to the defense prior to or during the first trial. Prior to the first trial the government disclosed an FBI report regarding an interview of W-1's attorney – containing the attorney's representations of what W-1 told him – but not the documentation of

W-1's FBI interview with Agent Oxley. The notes and report of the W-1 interview were finally disclosed to the defense on January 21, 2016.

W-1 has a medical condition, which has rendered her unable to work, and she lives on the other side of the country.³ Had the government disclosed the FBI's documentation of W-1's interview prior to the first trial, she would have been called as a witness in 2010 before she was stricken with illness. Instead, the government suppressed the documents and now seeks to prevent the defense from securing W-1's testimony through a deposition. The Court should order the deposition of W-1 in the interests of justice.

W-1's current condition and residence on the other side of the country make her unavailable – or likely to be unavailable – for Rule 15 purposes. In *Harrison v. United States*, 435 A.2d 734 (D.C. 1981) (en banc) (overruling on other grounds recognized by *Reyes-Contreras v. United States*, 719 A.2d 503, 507 (D.C. 1998), both the trial court and the Court of Appeals determined that the witness was unavailable for hearsay purposes where the witness lived in Louisiana and the witness's daughter represented that the witness was undergoing treatment for “a nervous condition.” *Harrison*, 719 A.2d at 735-36. Here, W-1 has a far more serious medical condition and lives further away.

The government's argument that “even an illness, without more,” does not constitute unavailability is both factually and legally wrong. Obviously, there is more than illness here because – as the Court in *Harrison* recognized – cross-country travel is a significant factor. The government's argument is legally flawed because it relies on *Stack v. United States*, 519 A.2d 147 (D.C. 1986). The Court's focus in *Stack* was primarily on the defendant's “opportunity to

³ Details regarding W-1's medical condition, her name, and her address will be provided in a separate document. The defense requests that the Court maintain that information under seal for the witness's privacy, the same reason the Court imposed a protective order with respect to the documents disclosed by the government in discovery.

exercise a fundamental constitutional right,” *id.* at 158 – confrontation of the witness against him before a jury of his peers – a concern that is not at issue here. The *Stack* court simply held that ailments common to many older people and “impressionistic, personal opinions about the effect of a trial appearance” are an insufficient basis to deny the defendant’s fundamental constitutional rights. *Id.* When contested, *Stack* held, unavailability claims that *testifying itself* would exacerbate a medical condition require expert opinion. *Id.* *Stack* did not involve medical conditions like those facing W-1, and the witness there did not suffer the same impairment as W-1: in *Stack* the witness was “still active, going to work every week ...” *Id.* Furthermore, *Stack* did not involve travel-related issues at all: the witness was local. *Id.* Furthermore, *Stack* did nothing to diminish *Harrison*, instead noting that the evidence in *Harrison* – related to cross-country travel and a nervous condition – “involved facts about which a layperson would be knowledgeable.” *Id.* at 157-58.

W-1’s serious medical condition and residence on the other side of the country create a likelihood that her testimony will not be available to the defendant at trial in October, absent a deposition in California in advance of trial. This situation was created, at least in part, by the government’s failure to disclose documentation of the FBI’s interview of W-1 prior to the first trial. The government’s current attempt to preclude the defense from securing W-1’s testimony should be rejected, as it is contrary to the interests of justice in this case.

W-2

W-2, like W-1, was in a romantic relationship with Gary Condit, although it ended approximately five years prior to Mr. Condit’s relationship with Ms. Levy.

W-2 informed the FBI in 2001 that Mr. Condit “liked to tie up [W-2] during sexual encounters.” IGRT_FBI_2250. W-2 also told the FBI that Mr. Condit expressed a preference

for an iron bed with posts for bondage purposes. *Id.* The FBI report and notes documenting the FBI interviews of W-2 were not disclosed to the defense prior to the first trial. If W-2's testimony is consistent with her statements to the FBI, W-2's testimony, like W-1's, will provide a connection between Condit and the tights that were tied in knots found near Ms. Levy's remains.

W-2 came forward to the FBI in 2001 because she was concerned for Ms. Levy, based on how Condit had treated her. W-2 informed the FBI that Condit was "controlling" in the relationship and told her that if she was ever asked about her affair with Condit to "deny it to the end." IGRT_FBI_3236-27. W-2 told the FBI in 2001 that during the relationship she became scared of Condit, and when she came forward she attempted to do so anonymously because she "feared repercussions from Condit" for telling the FBI about her relationship with him. IGRT_FBI_3235; IGRT_FBI_3239. Before W-2 came forward to the FBI, Condit's chief of staff told W-2 that she should not talk to the police and "told her to leave the past in the past." IGRT_FBI_2250. W-2's testimony about Condit's demands for secrecy about their relationship will demonstrate Condit's motive to silence Levy and demonstrate the incredibility of Condit's testimony that he "made no attempt to keep anything secret" about his similar relationship with Levy.

W-2's testimony about Mr. Condit's efforts – through a proxy – to prevent her from speaking with the police is also evidence of his corruption bias, which the defense will be entitled to present after Mr. Condit's testimony.

W-2 provided her information about Mr. Condit to the FBI in May of 2001. The FBI report of her interview was not provided to the defense until 2016.

W-2 lives on the West Coast and three family members depend on her for their daily care. She is unable to leave these three family members behind for the at least three days that would be necessary for her travel and testimony. Three days away from her family would be the very-best case scenario, assuming that flights and the trial schedule work out perfectly. The government should have disclosed the FBI documents regarding W-2 prior to the first trial, and the interests of justice require that the Court allow the defense to secure W-2's testimony through deposition.

W-3

W-3 also had a romantic affair with Mr. Condit, although it ended approximately fifteen years prior to his relationship with Levy. W-3 will testify that Mr. Condit informed her that if anything should happen to him while they were together, she should not call the police or the paramedics. Instead, Mr. Condit provided her with a phone number and explained that the person who answered was someone he could trust and who would take care of any issues, rather than the police. Mr. Condit advised W-3 to call the number from a payphone. W-3's testimony would provide circumstantial evidence that Mr. Condit had access to resources to help him avoid police involvement in his affairs. W-3's testimony would also demonstrate that Mr. Condit's testimony that he "made no attempt to keep anything secret" about his similar relationship with Levy was false.

W-3's testimony about Mr. Condit's system to prevent the flow of information to the police is also evidence of his corruption bias, which the defense will be entitled to present after his testimony.

W-3 can be deposed at the same date and location as W-1 and W-2. Counsel submits that it would be more efficient to take her testimony there, rather than have the Court pay her expenses to appear at trial.

W-4

W-4 was Mr. Condit's friend and served as his bodyguard and driver through 2001. The close relationship between W-4 and Mr. Condit is corroborated by numerous witnesses and is undisputed.

W-4's testimony will link Mr. Condit to Jennifer Thomas.

Susan Levy, Chandra Levy's mother, informed the FBI and the MPD that *before* Chandra Levy went missing, she received information that Jennifer Thomas had an affair with Mr. Condit, and that Jennifer Thomas went into hiding after the relationship ended because she was afraid of Mr. Condit. Susan Levy learned this information from O.C. Thomas, Jennifer Thomas's father. Susan Levy was concerned about her daughter's safety and spoke to her about the information. Chandra Levy later reported to her mother that she had confronted Mr. Condit about the O.C. Thomas / Jennifer Thomas information. There is independent evidence that corroborates that a conversation about Jennifer Thomas and O.C. Thomas took place between Susan Levy and the decedent while she was dating Mr. Condit.

After Chandra Levy disappeared, O.C. Thomas told the FBI about his daughter's affair with Mr. Condit and subsequent fear of Mr. Condit. IGRT_FBI_3782-83. Mr. Thomas explained that his family would not want him to share the information. *Id.* Mr. Thomas later reported to the FBI that he received threats for coming forward, including a caller who named his family members, listed their addresses, and said "I don't want you talking to law enforcement." IGRT_FBI_3535. After receiving threats, Mr. Thomas recanted his story. Jennifer Thomas

denies having had a relationship with Mr. Condit. Mr. Condit has claimed not to know Jennifer Thomas. W-4, based on his own observations as Mr. Condit's friend, bodyguard, and driver, will provide testimony linking Ms. Thomas and Mr. Condit.

W-4 lives on the other side of the country and has a medical condition that will prevent him from travelling to the jurisdiction to testify. W-4 has indicated that he will not attend trial.

THE GOVERNMENT'S COMPLAINTS ABOUT COST AND INCONVENIENCE

The government complains that there will be travel costs for its attorneys to attend the depositions, but the depositions will actually save resources. Counsel has confirmed that the noticed deposition locations are capable of providing live video communications over the internet, so that government counsel will be able to participate from the government's offices here in Washington, D.C. The government, therefore, will not have to pay any travel expenses. The government also complains that it will have to pay for Mr. Guandique to attend the deposition, but Mr. Guandique waived his right to be present for the depositions.

Because the Court will not have to pay for the witnesses' travel and accommodations during trial, the depositions will actually save the Court's resources. The depositions will also avoid potentially costly and inconvenient delays during the trial, should any of the witnesses experience travel complications or choose to mount legal challenges to their required attendance.

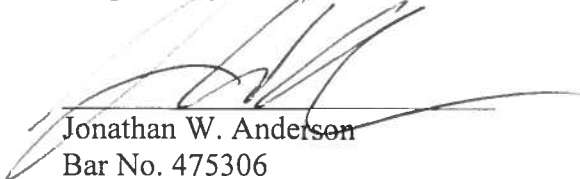
THE GOVERNMENT'S COMPLAINT ABOUT JENCKS

In significant part, what the defense knows about these witnesses, it knows from materials provided recently provided by the government. Many of the documents and notes regarding these witnesses were suppressed by the government during the first trial. The government has the Jencks material for these witnesses, and in some instances has had it almost fifteen years longer than the defense.

CONCLUSION

For the reasons stated in this supplemental notice, Mr. Guandique, through counsel, respectfully moves this Court to order the depositions of W-1, W-2, W-3, and W-4.

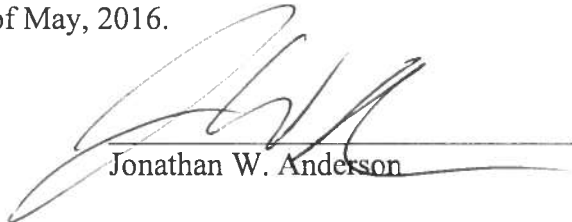
Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of this motion has been served, electronically, upon David Gorman, Office of the United States Attorney, 555 4th Street, N.W., Washington, D.C. 20530, David.Gorman2@usdoj.gov, this 19th day of May, 2016.



Jonathan W. Anderson