

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

CASE NO: 21-CR-175-TJK

v.

ENRIQUE TARRIO,

Defendant.

_____ /

MOTION TO ALLOW TESTIMONY OF MS. LINDSAY OLSON

COMES NOW the Defendant, Enrique Tarrio, by and through his attorneys, and respectfully moves this Honorable Court under Fed. R. Evid. 614 to allow the testimony of Ms. Lindsay Olson of In-Lux Research and Analytics, Dallas, Texas. Ms. Olson conducted an updated polling in September-October 2022 which resulted in an astounding 91.1 % *prejudicial bias* for *both* periods.

The onslaught of negative and prejudicial media attention continues, and the Proud Boys were highlighted in yesterday's dramatic January 6 Committee hearings. Among the many allegations levied publicly at the hearings yesterday was that the Proud Boys, "They think that they will have a large enough group to march into DC armed and will outnumber the police so they can't be stopped," and

"Their plan is to literally kill people. Please take this tip seriously and investigate further." The source also made clear that "[t]he proud boys [had] detailed their plans on multiple websites" like <http://thedonald.win/...> The Proud Boys were the leaders of the insurrection on January 6 bemoaned another of the committee's participants. The committee ended with a ceremonial and symbolic subpoena to President Donald Trump and threats for criminal referrals for multiple individuals.

Ms. Olson's testimony is crucial to benefit the Court in its analysis and determination whether to change venue in this case.

WHEREFORE, Mr. Tarrio respectfully moves this Court to grant the motion to allow testimony from Ms. Linday Olson.

Respectfully submitted,

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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 14th day of October, 2022 to the following:

Jason McCollough
Luke Jones
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