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11 IN THE UNITED STATES DISTRICT COURT
12 DISTRICT OF ARIZONA

13 United States of America,
14 Plaintiff,

15 vs.

16 Thomas Mario Costanzo,
17 Defendant.

No. CR-17-00585-01-PHX-GMS

NOTICE OF JOINDER

18 Thomas Mario Costanzo hereby gives Notice of Joinder in co-
19 defendant Steinmetz's Motion for Grand Jury Instructions and Transcripts (Dkt.
20 #54), filed October 30, 2017, and Second Motion to Extend Time to File Pretrial
21 Motions (Dkt. #60).

22 Defendant joins without exception to the Second Motion to Extend Time to
23 File Pretrial Motions (Dkt. # 60), and joins in the legal arguments advanced in the
24 Motion for Grand Jury Instructions and Transcripts (Dkt. #54), extending that
25 argument to include Counts 3, 4, 5, 6, & 7 of the First Superseding Indictment
26 (Dkt. #18), in that each of the charged money laundering counts alleges that
27 defendant acted "with the intent to avoid a transaction reporting requirement
28 under federal law" but does not specify which such requirement was presented by
the government and ultimately found by the grand jury.

1 Thomas Mario Costanzo reasserts the above-referenced motions of
2 co-defendant as if the government had not moved to dismiss Counts 1 & 2 of the
3 present indictment (Dkt. # 70), and joins in any hearings held before this
4 Honorable Court concerning disclosure of grand jury proceedings as well as
5 hearing regarding extending time to file motions.

6 It is expected that excludable delay under Title 18 U.S.C. Section
7 3161(h)(1)(F) may occur as a result of this motion or from an order based
8 thereon.

9 Respectfully submitted: November 13, 2017.

10 JON M. SANDS
11 Federal Public Defender

12 *s/Maria T. Weidner*
13 MARIA T. WEIDNER
14 Asst. Federal Public Defender

1 Copy of the foregoing transmitted by ECF for filing November 13, 2017, to:

2 CLERK'S OFFICE
3 United States District Court
4 Sandra Day O'Connor Courthouse
5 Phoenix, Arizona 85003

6 MATTHEW BINFORD
7 CAROLINA ESCALANTE-KONTI
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10 LEE DAVID STEIN
11 MICHAEL MORRISSEY
12 Counsel for Co-Defendant
13 Peter Nathan Steinmetz

14 Copy mailed to:

15 THOMAS MARIO COSTANZO
16 Defendant

17 s/yc

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