

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA	:	Criminal No. 17-464
	:	
v.	:	
	:	
DANIELLE SINDZINGRE and	:	
MURIEL BESCOND,	:	
	:	
Defendants	:	

**MOTION TO DISMISS THE INDICTMENT BASED UPON IMPERMISSIBLE
SELECTIVE PROSECUTION OR, IN THE ALTERNATIVE, FOR LEAVE TO
CONDUCT DISCOVERY RELATED TO SELECTIVE PROSECUTION**

Muriel Bescond, by and through her undersigned attorneys, respectfully moves the Court to dismiss the Indictment based upon selective prosecution, or in the alternative, for leave to conduct discovery related to her claim of selective prosecution. In support thereof, Mme. Bescond relies on the accompanying Memorandum of Law. Mme. Bescond requests oral argument on this Motion.

Respectfully submitted,

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(Pro hac vice application pending)

Dated: July 6, 2018

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