UNITED STATES DISTRICT COURT DISTRICT OF MAINE

UNITED STATES OF AMERICA)	
)	
)	
v.)	
)	Docket No. 2:22-cr-12-GZS
JASON PARENT,)	
Defendant)	
)	

NOTICE OF (PARTIAL) JOINDER IN MOTION TO DISMISS

NOW COMES the Defendant, Jason Parent by and through undersigned counsel, and hereby provides notice of (partial) joinder in the Motions to Dismiss filed by Defendants Glenn Robbins and Western Sea, Inc. (*ECF #213*).

FACTUAL/PROCEDURAL BACKDROP

On October 20, 2022, Defendant Jason Parent was indicted on a single count of conspiracy to "defraud the United States by interfering with and obstructing, by deceitful and dishonest means, a lawful function of NOAA, namely, the collection, evaluation, and analysis of biological, economic, and catch data" relating to Atlantic herring. See Superseding Indictment at ¶ 18 (ECF #140). Defendants Glenn Robbins and Western Sea, Inc. have moved to dismiss that count on grounds that the charge "either does not criminalize the alleged conduct or is void for vagueness as written and as applied." ECF

#213. To avoid redundancy and preserving all prior arguments by Jason Parent related to the Bill of Particulars (see ECF #135), and because the points and authorities set forth in Mr. Robbins and the Western Sea's Motion to Dismiss are equally applicable to Mr. Parent, he hereby joins the motion docketed at ECF #213 with regard to section I and incorporates it herein by reference.

Dated at Portland, Maine this 25th day of January 2023.

Respectfully submitted,

/s/ David J. Bobrow, Esq.
Attorney for Defendant
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CERTIFICATE OF SERVICE

- I, David J. Bobrow, Esq., hereby certify that I have caused to be served via ECF the Joinder on Motion to Dismiss on the following individuals:
- 1. Joyce, David (USAME) < David.Joyce@usdoj.gov>
- 2. All other attorneys of record in this matter.

Dated at Portland, Maine this 25th day of January 2023.

Respectfully submitted,

/s/ David J. Bobrow, Esq.
Attorney for Defendant
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