UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 12-40026-WGY
	)	
JOHN J. O'BRIEN,	)	
ELIZABETH V. TAVARES, and	)	
WILLIAM H. BURKE, III,	)	
	)	
Defendants.	)	

GOVERNMENT'S MOTION TO DISMISS COUNTS 13-30 OF THE INDICTMENT

Pursuant to Fed. R. Crim. P. 48(a), the United States of America, by and through its attorneys, Carmen M. Ortiz, United States Attorney, and Assistant U.S. Attorneys Cynthia A. Young, Fred M. Wyshak, Jr., Karin M. Bell, and Robert A. Fisher, hereby moves to dismiss without prejudice Counts 13-30 of the indictment in the above referenced case.

In support of this request for dismissal of Counts 13-30, the United States submits that the dismissal of these counts is in the interests of justice and judicial economy.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/Cynthia A. Young
CYNTHIA A. YOUNG
Chief, Criminal Division

/s/Robert A. Fisher
KARIN M. BELL
FRED M. WYSHAK, JR.
ROBERT A. FISHER
Assistant U.S. Attorneys

Leave to File Granted:

William G. Young
William G. Young, Judge
United States District Court

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on November 19, 2014.

/s/ Robert A. Fisher
Assistant U.S. Attorney

Dated: November 19, 2014