

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

UNITED STATES OF AMERICA,	§	No. 5:22-CR-50053-001
Plaintiff,	§	
vs.	§	<u>MOTION TO INTERVENE</u>
	§	
ROBERT F. CESSARIO	§	
Defendant,	§	
vs.	§	
	§	
JONATHAN WOODS	§	
Proposed Intervenor.	§	

PROPOSED INTERVENOR JONATHAN WOODS’ MOTION TO INTERVENE

COMES NOW Intervenor Jonathan Woods, by and through undersigned counsel, and Pursuant to Rule 47(a) of the Federal Rules of Criminal Procedure, hereby respectfully moves to intervene in the present case. Intervention is warranted because in this limited circumstance, proposed Intervenor’s constitutional and federal rights are implicated by the resolution of this particular criminal case. As well, Intervenor’s rights cannot be fully represented or protected by the United States of America.

For the reasons discussed herein and the accompanied Brief in Support, the Intervenor respectfully requests that this Court grant the Motion to Intervene in this matter. Specifically, Intervenor requests:

- (1) Detailed Allocution – For the first time, Mr. Cessario will not be able to hide his former credentials as an agent of the FBI, nor his 5th Amendment rights. Because of this, Intervenor requests that as a condition of entering his manifestly lenient sentence,

Cessario be forced to disclose the contents of all of the information he feloniously deleted from the hard drive, with specificity and complete candor;

- (2) Intervenor seeks all evidence exchanged in this criminal suit;
- (3) Intervenor seeks all sealed evidence in this criminal suit; and
- (4) Intervenor asks that Mr. Cessario's sentencing be stayed pending Intervenor's opportunity to be heard on his motion. Intervenor notes that the United States, the tough prosecutors they are, are only seeking one (1) year of unsupervised probation. Accordingly, no party to this suit, let alone the public (who are closely viewing this case to see how the machinery of government treats one of its own, who has admitted to committing felonies), will be prejudiced, should the Court stay Mr. Cessario's sentencing pending a hearing on Mr. Woods' Motion to Intervene.

Respectfully submitted,

/s/ John C. Burns
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Attorney for Intervenor Jonathan Woods

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Intervenor's Motion to Intervene was served on counsel of record for Defendant and for the Government via the court's CM/ECF on January 4, 2023.

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