UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES, Plaintiff vs **DAHIR NOR IBRAHIM,** Defendant	Case No. 3:10-00260-15 Hon. Haynes

DNI #15 Motion to Join Grady 4-23-12

MOTION TO JOIN DEFENDANT NO. 8'S MOTION TO EXCLUDE TESTIMONY OF JANE DOE 5

Defendant Dahir Nor Ibrahim, Defendant No. 15, moves to join the motion to exclude the testimony of Jane Doe 5 filed by Defendant No. 8. (D.E. 2338).

As additional grounds, Defendant states as follows:

1. The government filed a response to the Court's order regarding Defendant's motion for a bill of particulars on March 28, 2012. (D.E. 2188) In that response, the government alleged the following facts against the Defendant:
   a. In 1999, when Jane Doe 5 was allegedly 15 years of age, she was prostituted by Defendant No. 1.
   b. Dahir "Lucky" (Def. No. 15) took girls to apartments in Minnesota on a regular basis.
   c. "Everyone knew" Lucky and that Lucky "gave all the guys money".
   d. Lucky and Adan (Def. No. 1) prostituted "other girls" who were teenagers.
   e. Lucky recruited teenagers.
   f. Lucky took these girls to various apartments for prostitution.
   g. All the above occurred in the summer of 1999 and 2000.
      i. 18 U.S.C. 1591 was enacted in October 28, 2000, P.L. 106-386 §112(a)(2), 114 Stat. 1487. Therefore, each and every act alleged above occurred before the law was enacted and were not illegal under federal

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