

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	1:21-cr-00397-TFH
	:	
CHRISTIAN KULAS,	:	MAGISTRATE NO. 21-MJ-459
	:	
Defendant.	:	VIOLATIONS:
	:	
	:	18 U.S.C. § 1752(a)(1)
	:	(Entering and Remaining in a Restricted
	:	Building or Grounds)
	:	
	:	40 U.S.C. § 5104(e)(2)(D)
	:	(Disorderly Conduct in a
	:	Capitol Building)
	:	
	:	40 U.S.C. § 5104(e)(2)(G)
	:	(Parading, Demonstrating, or Picketing in a
	:	Capitol Building)

**MOTION FOR ADMISSION OF RACHEL M. CANNON *PRO HAC VICE***

Pursuant to Rule 44.1 of the Local Criminal Rules of this Court, Rachel M. Cannon, by the undersigned sponsoring counsel, moves the Court for Permission to appear *pro hac vice* on behalf of Defendant Christian Kulas in the above-captioned case. In support of this motion, Ms. Cannon provides her declaration, attached as Exhibit A.

Date: August 19, 2021

Respectfully submitted,

By: s/ Brian Heberlig  
Brian Heberlig  
Steptoe & Johnson LLP  
1330 Connecticut Avenue, NW  
Washington DC 20036

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY the foregoing **MOTION FOR ADMISSION OF RACHEL M. CANNON *PRO HAC VICE*** was served upon counsel of record automatically via CM/ECF this 19th day of August 2021.

*/s/ Brian Heberlig*

---

Brian Heberlig  
Steptoe & Johnson LLP

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	1:21-cr-00397-TFH
	:	
CHRISTIAN KULAS,	:	MAGISTRATE NO. 21-MJ-459
	:	
Defendant.	:	VIOLATIONS:
	:	
	:	18 U.S.C. § 1752(a)(1)
	:	(Entering and Remaining in a Restricted
	:	Building or Grounds)
	:	
	:	40 U.S.C. § 5104(e)(2)(D)
	:	(Disorderly Conduct in a
	:	Capitol Building)
	:	
	:	40 U.S.C. § 5104(e)(2)(G)
	:	(Parading, Demonstrating, or Picketing in a
	:	Capitol Building)

**DECLARATION OF RACHEL M. CANNON  
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

I, Rachel M. Cannon, make the following declaration pursuant to 28 U.S.C. § 1746:

1. I make this declaration upon personal knowledge and am competent to testify to the facts set forth herein.

2. I am an attorney with Steptoe & Johnson LLP, and counsel for Defendant Christian Kulas. My office address is 227 West Monroe Street, Suite 4700, Chicago, IL 60606. My business telephone number is (312) 577-1270.

3. I am a member in good standing of the Bar of the state of Illinois. My bar identification number is 6257028.

4. I am admitted to the following courts:

- Illinois
- U.S. Court of Appeals, Eleventh Circuit
- U.S. Court of Appeals, Seventh Circuit

- U.S. District Court, Northern District of Illinois
- U.S. District Court, Northern District of Illinois, Trial Bar

5. I hereby certify that I have never been disciplined by any Bar in any jurisdiction.

6. I have not been admitted *pro hac vice* in this Court within the last two years.

7. I reside and practice law from an office outside this district. I am not a member of the District of Columbia Bar, and I do not have an application for membership pending.

8. The name, address, and telephone number of the sponsoring attorney of record is:  
Brian Heberlig (D.C. Bar No. 455381.)

Steptoe & Johnson LLP  
1330 Connecticut, NW  
Washington, D.C. 20036  
(202) 429-8134  
bheberlig@steptoe.com

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of August, 2021, at Chicago, Illinois.

Respectfully submitted,

By: s/ Rachel M. Cannon  
Rachel M. Cannon  
Steptoe & Johnson LLP  
227 West Monroe Street, Suite 4700  
Chicago, IL 60606  
[rcannon@steptoe.com](mailto:rcannon@steptoe.com)

Attorney for Defendant Christian Kulas

## Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Rachel Marie Cannon

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/05/1998 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name and affixed the  
seal of said Court, this 18th day of  
August, 2021.



Clerk,  
Supreme Court of the State of Illinois

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	1:21-cr-00397-TFH
	:	
CHRISTIAN KULAS,	:	MAGISTRATE NO. 21-MJ-459
	:	
Defendant.	:	VIOLATIONS:
	:	
	:	18 U.S.C. § 1752(a)(1)
	:	(Entering and Remaining in a Restricted
	:	Building or Grounds)
	:	
	:	40 U.S.C. § 5104(e)(2)(D)
	:	(Disorderly Conduct in a
	:	Capitol Building)
	:	
	:	40 U.S.C. § 5104(e)(2)(G)
	:	(Parading, Demonstrating, or Picketing in a
	:	Capitol Building)

**PROPOSED ORDER**

UPON CONSIDERATION of the Motion for Admission of Rachel M. Cannon *Pro Hac Vice* and pursuant to Rule 44.1 of the Local Criminal Rules of this Court and supporting Declaration,

IT IS, this \_\_\_\_\_ day of August, 2021, ORDERED that the Motion be and hereby is GRANTED.

---

The Honorable Thomas F. Hogan  
United States District Judge