

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

**UNITED STATES OF AMERICA**

**vs.**

**CASE NO: 21-cr-28(APM)**

**CONNIE MEGGS**  
\_\_\_\_\_ /

**NOTICE OF ADOPTION OF CO-DEFENDANT'S MOTIONS**

**COMES NOW** the defendant, CONNIE MEGGS, through counsel, and files this Notice Of Adoption of the following motions filed by co-defendants, pursuant to this Court's instruction at the July 2, 2021 status conference.

1. Motion to Dismiss Counts 1-4 and 12 of the Fourth Superseding Indictment, filed by Kenneth Harrelson at Doc. 278;
2. Motion to Dismiss Counts 1-2 for Failure to State an Offense and For Vagueness filed by Donovan Ray Crowl at Doc. 288
3. Motion to Change Venue filed by Thomas Caldwell at Doc. 273

Ms. Meggs adopts and incorporates by reference the arguments and supporting case law in the above motions.<sup>1</sup> The facts alleged in Counts One through Four of the Fourth Superseding Indictment are identically charged to Ms. Meggs. The legal analysis of the above motions will apply equally to Ms. Meggs. Accordingly, Ms. Meggs files this Notice to obtain the benefit of the court's rulings without unduly burdening the court and record with unnecessarily duplicative filings and pleadings.

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<sup>1</sup> Ms. Meggs previously filed a motion to adopt Defendant Caldwell's Motion to Dismiss Case at Doc. 240 (See Doc. 262)

Pursuant to Fed. R. Crim. P. 12, Ms. Meggs reserves the right to supplement this motion to adopt, or to file additional pre-trial motions on or before the September 2, 2021 deadline. *See* this Court's Order Scheduling deadline for Pretrial Motions. Doc. 289.

RESPECTFULLY SUBMITTED,

/s/ Mary K. Anderson  
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I HEREBY CERTIFY that on July 10<sup>th</sup> 2021 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to counsel for the government.