UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v. Case No. 21-cr-00028-APM-10

KENNETH HARRELSON,

Defendant.

MOTION FOR ADMISSION OF ATTORNEY PRO HAC VICE FOR DEFENDANT KENNETH HARRELSON

Pursuant to Criminal Local Rule 44.l(d), Defendant Kenneth Harrelson moves for the admission and appearance of attorney Bradford L. Geyer *pro hac vice* in the above-entitled action. This motion is supported by the Declaration of Bradford L. Geyer, Esq., filed herewith.

Defendant Kenneth Harrelson wishes for Bradford L. Geyer, Esq., to represent him as legal counsel in this criminal case and Bradford L. Geyer, Esq., proposes to represent Harrelson in this case, including as early as the hearing currently scheduled for September 8, 2021, at 2:00 PM.

Bradford L. Geyer is admitted and an active member in good standing in the following courts of bars: Commonwealth of Pennsylvania, State of New Jersey, United States District Court for the Eastern District of Pennsylvania, United States District Court for the District of New Jersey. I am advised that he has had extensive experience including as a federal prosecutor.

This motion is supported and signed by Jonathon Moseley an active and sponsoring member of the Bar of this Court. As the sponsoring attorney, I am and will remain available to consult with Mr. Geyer as may be needed to assist him with local practice and

to the extent that the Court requires to review pleadings and participate in hearings with

Mr. Geyer including as early as the hearing currently scheduled for September 8,

2021, at 2:00 PM if I may join remotely by video / virtual appearance.

I understand that he will familiarize himself with the local rules of this Honorable

Court and I will be available to assist with that and consult on any questions about them.

I have examined the question of any conflict of interest and have determined that

there is at present no evident grounds for any conflict or adverse position, but will remain

vigilant if circumstances later emerge that might require revisiting that question.

I will remind Mr. Geyer that the U.S. District Court for the District of Columbia

requires a fee of \$100 for the filing of this Motion for Admission of Attorney Pro Hac

Vice, until paid.

Dated this 7th day of September, 2021.

RESPECTFULLY SUBMITTED

<u>/s/ Jonathon Alden Moseley</u>

Jonathon Alden Moseley, Esq. Jonathon Moseley, Attorney at Law

DC Bar No. VA005

Virginia State Bar No. 41058

5765-F Burke Centre Parkway, PMB #337

Burke, Virginia 22015

Telephone: (703) 656-1230

Contact@JonMoseley.com

Moseley391@gmail.com

CERTIFICATE OF SERVICE

I hereby certify from my review of the PACER / ECF docket records for this case that the following attorneys will receive notice through the ECF system of the U.S. District Court for the District of Columbia.

Ahmed Muktadir Baset

U.S. ATTORNEY'S OFFICE
United States Attorney's Office for the District of Col
555 Fourth Street, N.W. Room 4209
Washington, DC 20530
202-252-7097
ahmed.baset@usdoj.gov

Troy A. Edwards, Jr

U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA 555 4th Street, NW Washington, DC 20001 202-252-7081 troy.edwards@usdoj.gov

Louis J. Manzo

DOJ-CRM 1400 New York Ave NW Washington, DC 20002 202-616-2706 louis.manzo@usdoj.gov

Jeffrey S. Nestler

U.S. ATTORNEY'S OFFICE 555 Fourth Street NW Washington, DC 20530 202-252-7277 jeffrey.nestler@usdoj.gov

Kathryn Leigh Rakoczy

U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA 555 Fourth Street, NW Washington, DC 20530 (202) 252-6928 (202) 305-8537 (fax) kathryn.rakoczy@usdoj.gov

Justin Todd Sher U.S. DEPARTMENT OF JUSTICE 950 Pennsylvania Avenue NW Washington, DC 20530 202-353-3909 justin.sher@usdoj.gov

Jonathon Moseley, Esq.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v. Case No. 21-cr-00028-APM-10

KENNETH HARRELSON,

Defendant.

<u>DECLARATION OF BRADFORD L. GEYER</u> INSUPPORT OF MOTION FOR ADMISSION OF ATTORNEY *PRO HAC VICE*

- I, Bradford L. Geyer, hereby declare:
- 1. My office is located at 2006 Berwick Drive, Cinnaminson. My telephone number is (856) 607-5708.
- 2. Since 1991, I have been admitted to practice law in the Commonwealth of Pennsylvania and the State of New Jersey. Since 1991, I have been admitted to practice law before the United States District Court for the District of New Jersey and the United States District Court for the Eastern District of Pennsylvania.
- 3. I am currently in good standing with all states, courts, and bars in which I am admitted. I have never been disciplined by any bar.
- 4. In the last two years I have been admitted pro hac vice in the Northern District of California.
- 5. I do not have an office located in the District of Columbia.

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

Executed in Philadelphia, Pennsylvania, this 10th day of June, 2021.

Respectfully submitted,

BY: *Isl Bradford L. Geyer*

Bradford L. Geyer Attorney for Defendant Kenneth

Harrelson

Pennsylvania Bar ID #: 62998

2006 Berwick Drive Cinnaminson, NJ 08077

Email: <u>Bradford@formerfedsgroup.com</u>

P: (856)-607-5708

CLERK'S OFFICE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA WASHINGTON, D.C. 20001

UNITE	ED STATES OF AMERICA			
	VS.		Criminal Number 2	l-cr-00028
Kenneth Harrelson				
	(Defendant)	and a photogram		
TO:	ANGELA CAESAR, CLERK			
YOU ARE HEREBY NOTIFIED THAT I APPEAR FOR THE DEFENDANT INDICATED ABOVE IN THE ENTITLED ACTION.				
I AM APPEARING IN THIS ACTION AS: (Please check one)				
	CJA RETA	NED	FEDERAL PU	BLIC DEFENDER
			(Signature)	
	PLEASE PRINT THE FOLLOWING INFORMATION:			
	Bradford L. Geyer (PHV pending)			
	(Attorney & Bar ID Number) FormerFedsGroup.Com LLC			
	(Firm Name)			
	2006 Berwick Drive			
	(Street Address) Cinnaminson NJ 08077			
		(City)	(State)	$\frac{08077}{(Zip)}$
		(856)6	07-5708	G/F
	(Telephone Number)			

Supreme Court of New Jersey



Certificate of Good Standing

This is to certify that

Bradford Lee Geyer

(No. 022751991 Jersey on

) was constituted and appointed an Attorney at Law of New and, as such,

December 19, 1991

has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.



In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this June , 2021 23rd day of



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Bradford L. Geyer, Esq.

DATE OF ADMISSION

December 3, 1991

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal Dated: June 14, 2021

Patricia A. Johnson Chief Clerk