

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

| | | |
|----------------------------------|---|----------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| v. |) | No. 21-cr-537 (JMC) |
| |) | |
| STEPHEN CHASE RANDOLPH, |) | |
| |) | |
| Defendant. |) | |

**STEPHEN RANDOLPH’S MOTION TO DISMISS SUPERSEDING INDICTMENT
IN CRIMINAL MATTER NUMBER 21-332**

Defendant, Stephen Randolph, by and through his undersigned counsel, hereby submits this Motion to Dismiss the Superseding Indictment in Criminal Number 21-332. In support thereof, Mr. Randolph avers as follows:

- 1) On or about April 30, 2021, a nine-count Indictment was returned against Defendants Paul Johnson and Stephen Randolph alleging violations of 18 U.S.C. §§ 231(a)(3), 1512(c)(2), 111(a)(1), (b), 1752 (a)(1),(2), (b)(1)(A), (B) and 40 U.S.C. § 5104 (e)(2)(D), (F). The case was docketed as Criminal Number 21-332¹. On or about December 1, 2021, a nearly identical nine-count Superseding Indictment was returned against the same defendants alleging violations of the same statutes.
- 2) On or about January 12, 2022, a 14-count Indictment was returned against Defendants Ryan Samsel, James Grant, Paul Johnson, Stephan Randolph, and Jason Blythe in the instant criminal matter, 21-537, which was an existing case against Defendants Ryan

¹ The case was initially assigned to Judge Paul Friedman and later reassigned to this Court.

Samsel and James Grant. On the docket, the Indictment is described as Third Superseding Indictment (ECF 80), but the document itself is titled only “Indictment.”

- 3) The Indictment in the instant matter charges Mr. Randolph with the same alleged violations of 18 U.S.C. §§ 231(a)(3), 1512(c)(2), 111(a)(1), (b), 1752 (a)(1),(2), (b)(1)(A), (B) and 40 U.S.C. § 5104 (e)(2)(D), (F) as charged in criminal matter number 21-332.
- 4) Presumably the government does not intend to proceed on both the instant Indictment and the Superseding Indictment in criminal matter number 21-332; however, the government has not moved to dismiss the latter.

Mr. Randolph respectfully moves the Court to dismiss the Superseding Indictment in criminal matter number 21-332 and direct the Clerk of Court to designate that case as closed.

Respectfully submitted,

/s/ Angela Halim
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record, via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Angela Halim
Angela Halim, Esq.

Dated: October 28, 2022

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| STEPHEN CHASE RANDOLPH, |) | |
| |) | |
| Defendant. |) | |

ORDER

AND NOW, this ____ day of _____, 2022, upon consideration of Defendant's Motion to Dismiss Superseding Indictment in Criminal Matter Number 21-332 and any response thereto, it is hereby **ORDERED** that Defendant's Motion is **GRANTED**. The Superseding Indictment criminal matter number 21-332 shall be dismissed and the Clerk of Court is directed to designate that matter as closed.

SO ORDERED.

Date: _____

JIA M. COBB
United States District Judge