

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
Plaintiff)	Criminal Case 21-CR-28
)	
v.)	Motions Hearing: September 8, 2021
)	
WILLIAM ISAACS)	Judge Amit P. Mehta
Defendant)	

NOTICE OF JOINING MOTIONS OF CO-DEFENDANTS

PLEASE TAKE NOTICE that Defendant William Isaacs (“Mr. Isaacs”), through undersigned counsel, hereby joins and adopts the following motions filed by his co-defendants:

1. Motion to Dismiss Case by Defendant Thomas Caldwell (Docket Entry 240);
2. Motion to Change Venue by Defendant Caldwell (Doc. 273);
3. Motion to Dismiss Counts 1-4 and 12 of the Fourth Superseding Indictment by Defendant Kenneth Harrelson (Doc. 278); and
4. Motion to Dismiss Counts 1-2 for Failure to State an Offense and for Vagueness by Defendant Donovan Crawl (Doc. 288).

Moreover, Mr. Isaacs joins in and incorporates by reference the arguments raised and supporting case law in the above motions. To the extent the motions are fact specific to those defendants, the legal analysis will apply equally to all defendants, if granted.

Furthermore, Mr. Isaacs, unlike co-defendant Caldwell, is not named in Count 12. However, Count 12 includes arguments regarding an “official proceeding” under 18

U.S.C. § 1512(c)(1) – and thus, this Honorable Court’s determination on this issue would still be applicable to Mr. Isaacs, who is charged with obstructing an official proceeding under 18 U.S.C. § 1512(c)(2) in Count 2.

Additionally, Mr. Isaacs files this Notice to obtain the Court’s rulings on the motions, which will promote the just determination of the case, simplify procedures, and eliminate unjustifiable expense and delay in accordance with Federal Rule of Criminal Procedure 2.

Last, pursuant to Fed. R. Crim. P. 12, Mr. Isaacs reserves his right to file any motion, including, but not limited to, a filing to dismiss charges or for change of venue, by the September 2, 2021, deadline (Doc. 289) set by this Court.

Respectfully submitted,

_____/s/

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Counsel for Defendant William Isaacs

CERTIFICATE OF SERVICE

I hereby certify that the **NOTICE OF JOINING MOTIONS OF CO-
DEFENDANTS** was filed with the Clerk of the Court via ECF on Friday, July 9, 2021.

Respectfully submitted,

_____/s/_____
Gene Rossi, Esquire