

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :  
 :  
 v. : Case No. 21-cr-0091-RCL-01  
 :  
 CRAIG MICHAEL BINGERT, et al., :  
 Defendant. :

**DEFENDANT CRAIG MICHAEL BINGERT'S MOTION  
TO ADOPT AND JOIN MOTION TO DISMISS COUNTS ONE, THREE,  
FOUR, FIVE & SIX OF THE SUPERSEDING INDICTMENT  
FILED BY CO-DEFENDANT ISAAC STEVE STURGEON (Doc. 55)**

COMES NOW defendant, Craig Michael Bingert, by and through his undersigned counsel, Allen H. Orenberg, Esquire, and hereby respectfully moves this Court for the entry of an Order granting leave to adopt and join, the Motion to Dismiss Counts One, Three, Four, Five & Six of the Superseding Indictment Filed by co-defendant Isaac Steve Sturgeon. (Doc. 55)

The facts and circumstances set forth in the co-defendant's motion to dismiss are equally and specifically applicable to Craig M. Bingert in this prosecution. And the legal arguments and authorities set forth in the co-defendant's motion are those which defendant Craig M. Bingert would have cited, had he filed a separate motion. It would be entirely duplicative for this defendant to expend compensable and considerable time preparing and filing this motion which would be identical to the motion filed by his co-defendant, Isaac Steve Sturgeon.

WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, defendant Craig M. Bingert respectfully moves for the entry of an Order granting leave to adopt and join, the above-referenced motion to dismiss (Doc. 55) filed by his co-defendant, Isaac Steve Sturgeon.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Counsel for Craig M. Bingert

Dated: December 13, 2021