

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA
Plaintiff,

vs.

CASE NO.: 21-CR-28 (APM)

CONNIE MEGGS
Defendant.

DEFENDANT'S STATEMENT OF ADOPTION

COMES NOW the defendant, CONNIE MEGGS, by and through undersigned counsel and files this Statement of Adoption of arguments made by co-defendant KELLY MEGGS in support of her pending Renewed Request for Pretrial Release and says:

1. Mrs. Meggs filed her Renewed Motion for Pre-Trial Release on March 9th, 2021. (Doc. 67)
2. On March 17th, 2021 Mrs. Meggs' husband, KELLY MEGGS, filed his Renewed Motion for Pre-Trial Release. (Doc. 82)
3. In KELLY MEGGS' motion, facts and argument were made that are common to both parties with respect to the issue of detention. These facts and argument were not known or apparent at the time of the filing of Mrs. Meggs' Motion.
4. To avoid duplicity of court filings, Mrs. Meggs respectfully asks to adopt those facts and legal argument made in KELLY MEGGS' motion that would otherwise be applicable to her as if fully set forth in her motion.

The undersigned has conferred with Assistant United States Attorney Jeffrey Nestler, Esq., who asserts the government's position remains that Mrs. Meggs should remain detained.

RESPECTFULLY SUBMITTED,

/s/ David Anthony Wilson
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 17th, 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 the following: Office of the United States Attorney.

/s/ David Anthony Wilson
DAVID ANTHONY WILSON