

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
Plaintiff)	
)	Criminal Case 21-CR-28-APM
v.)	
)	Judge Amit P. Mehta
WILLIAM ISAACS)	
Defendant)	

**THIRD NOTICE OF JOINING MOTIONS
OF CO-DEFENDANTS AND 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 in the above-referenced matter and defendants in related matters:

1. Defendant Thomas Caldwell’s Motion to Dismiss Counts 1, 2, 3, and 4, ECF. No. 84 in Case No. 22-CR-15-APM, as applicable to Mr. Isaacs, i.e., Count 2 [18 U.S.C. § 1512(k)], Count 3 [18 U.S.C. § 1512(c)(2),2], and Count 4 [18 U.S.C. § 372];
2. Defendant Joseph Hackett’s Motion to Dismiss Counts 1, 2, 3, and 4, ECF No. 89 in Case No. 22-CR-15-APM, as applicable to Mr. Isaacs, i.e., Count 2 [18 U.S.C. § 1512(k)], Count 3 [18 U.S.C. § 1512(c)(2),2], and Count 4 [18 U.S.C. § 372];
3. Defendants Thomas Caldwell’s and Connie Meggs’ Joint Motion to Transfer Venue, ECF No. 93 in Case No. 22-CR-15-APM and ECF No. 654 in Case No. 21-CR-28-APM;
4. Defendant James Beeks’ Motion to Dismiss Counts 5 and 7, ECF No. 638 in Case No. 21-CR-28-APM; and

5. Defendant Beeks' Motion for a Bill of Particulars, ECF No. 639 in Case No. 21-CR-28-APM.

Mr. Isaacs joins in and incorporates by reference the arguments raised and the case law cited 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.

Additionally, in filing this Notice, Mr. Isaacs seeks to benefit from this 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.

Dated: July 6, 2022
Washington, D.C.

Respectfully submitted,

_____/s/
Gene Rossi, Esquire
Virginia Bar Number 93136
Carlton Fields, P.A.
Suite 400 West
1025 Thomas Jefferson Street, NW
Washington, DC 20007-5208
Telephone: 202-965-8119
Email: grossi@carltonfields.com

Natalie A. Napierala, Esquire
New York State Bar Number 2445468
Carlton Fields, P.A.
36th Floor
405 Lexington Avenue
New York, NY 10174-0002
Telephone: 212-785-2747
Email: nnapierala@carltonfields.com

Charles M. Greene, Esquire
Florida Bar Number 938963
Law Offices of Charles M. Greene, P.A.
55 East Pine Street
Orlando, FL 32801
Telephone: 407-648-1700
Email: cmg@cmgpa.com

Counsel for Defendant William Isaacs

CERTIFICATE OF SERVICE

I hereby certify that the **THIRD NOTICE OF JOINING MOTIONS OF CO-
DEFENDANTS AND DEFENDANTS** was filed with the Clerk of the Court via ECF on
July 6, 2022.

Respectfully submitted,

_____/s/_____
Gene Rossi, Esquire