

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :  
 :  
 v. : Case No. 1:21-cr-0091-RCL-01  
 :  
 CRAIG MICHAEL BINGERT, et al., :  
 Defendant. :

**DEFENDANT CRAIG MICHAEL BINGERT'S MOTION FOR JOINDER**

COMES NOW Defendant, Craig Michael Bingert, by and through undersigned counsel, hereby respectfully moves to join defendant Isaac Steve Sturgeon's (1) Motion to Change Venue (Dkt. No. 82), and (2) Motion to Compel Discovery (Dkt. No. 83). As grounds, Mr. Bingert states as follows:

1. Craig Michael Bingert, along with co-defendant's Isaac Steve Sturgeon and Taylor James Johnatakis, are charged in all eight counts of the Superseding Indictment. (Dkt. No. 53)

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

3. Mr. Bingert respectfully request that the Court allow him each to join these motions filed by co-defendant Isaac Steve Sturgeon to the extent that they are applicable to him in the interests of judicial efficiency.

4. Mr. Bingert seeks the same relief applicable to him in the event that any of these subject motions are granted by the Court.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, Defendant, Craig Michael Bingert, hereby respectfully moves to join defendant Isaac Steve Sturgeon's (1) Motion to Change Venue (Dkt. No. 82), and (2) Motion to Compel Discovery (Dkt. No. 83).

Respectfully Submitted,

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Dated: November 6, 2022