

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

UNITED STATES OF AMERICA)	
)	Case No. 22-cr-15
v.)	
)	
KENNETH HARRELSON,)	
)	
Defendant.)	

**DEFENDANT KENNETH HARRELSON'S NOTICE OF JOINDER REGARDING
MOTIONS FILED BY CO-DEFENDANTS**

NOW comes Defendant, Kenneth Harrelson, by and through his counsel of record, Bradford L. Geyer, Esq., and respectfully requests while providing Notice to this Court of his intention to adopt and join the following motions filed by Co-Defendants in this matter:

- (1) Defendant Vallejo's Motion to Dismiss Count One and to Strike Surplusage at ECF No. 94 and ECF 95,
- (2) Defendant Caldwell's Motion to Change Venue at ECF No. 93,
- (3) Defendant Hackett's Motion To Sever Count 14, as it relates to Count 11 against Defendant Harrelson at ECF No. 91, and
- (4) Defendant Hackett's Motion to Dismiss Count 14, as it relates to Count 11 against Defendant Harrelson at ECF No 90.
- (5) Defendant Hackett's Motion to Dismiss Count 1, 2, 3, and 4 at ECF 89
- (6) Defendant Meggs Motion to Compel at ECF 85.

(7) Defendant Caldwell's Motion to Dismiss Count *1, 2, 3 and 4 of the Indictment* at ECF 84.

(8) Defendant Megg's Motion to Dismiss Count *I of the Seventh Superseding Indictment, adopting and supplementing Motion* at ECF 82

The cited case law and arguments set forth by Co-Defendants Vallejo, Caldwell, Hackett and Meggs in the above-specified motions apply to Defendant Harrelson and the Counts alleged against him in the Indictment. Allowing Mr. Harrelson to join the motions made by Co-Defendants simplifies this proceeding and eliminates delay.

Date: April 21, 2022

Respectfully Submitted,

/s/ Brad Geyer
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Attorney for Defendant Kenneth Harrelson

CERTIFICATE OF SERVICE

I hereby certify that, on April 21, 2022, the forgoing document was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ Bradford L. Geyer
Bradford L. Geyer