

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :  
 : Dkt. No.: 1:21-cr-00542-TJK  
v. :  
 :  
JONATHAN OWEN SHROYER, : May 6, 2022

**DEFENDANT’S SECOND MOTION TO DISMISS CRIMINAL CHARGES**

Pursuant to Federal Rule of Criminal Procedure 12 and Local Criminal Rule 47, the Defendant, Jonathan Owen Shroyer, hereby moves the Court to dismiss all four counts of the information. A journalist, Mr. Shroyer was arrested and charged criminally for engaging in Constitutionally-protected activity: attending and reporting on a protest. A statement of points and authorities is attached as required by Local Criminal Rule 47(a).

THE DEFENDANT  
/s/ Norman A. Pattis /s/  
NORMAN A. PATTIS, ESQ.  
PATTIS & SMITH, LLC  
383 Orange Street  
New Haven, CT 06511  
Tel: (203) 393-3017  
Fax: (203) 393-9745  
[npattis@pattisandsmith.com](mailto:npattis@pattisandsmith.com)

**PROPOSED ORDER**

The Court hereby orders that:

1. Count One of the Information against Jonathan Owen Shroyer be dismissed with prejudice;
2. Count Two of the Information against Jonathan Owen Shroyer be dismissed with prejudice;
3. Count Three of the Information against Jonathan Owen Shroyer be dismissed with prejudice; and
4. Count Four of the Information against Jonathan Owen Shroyer be dismissed with prejudice.

**GRANTED/DENIED**

Dated: \_\_\_\_\_

\_\_\_\_\_  
USDJ

**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that, on the foregoing date, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties of record by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

/s/ Norman A. Pattis /s/