IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	**CRIMINAL NO. 21-cr-28 (APM)**
	:	
v.	:	
	:	
JAMES BEEKS,	:	
	:	
Defendant.	:	
	:	

GOVERNMENT'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

On May 4, 2023, Defendant James Beeks filed a Motion to Dismiss Invoking the Declaration of Independence. ECF No. 926. In support of his motion, the defendant cites the Declaration of Independence, a history of alleged tyrannical acts by the United States government, and his claims of his own innocence. *Id.* None of these are bases for dismissal at this stage. *See* Fed. R. Crim. P. 12. To the extent that Defendant contends that he is being prosecuted solely for his political views, *id.* at 13, the Indictment alleges facts about his conduct—irrespective of political beliefs—that, if proven, would "state an offense." *See* Fed. R. Crim. P. 12(b)(3)(B)(v). Therefore, this argument for dismissal also fails.

WHEREFORE, Defendant Beeks' motion to dismiss should be DENIED.

Respectfully submitted,

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