

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

CASE NO: 1:22-mj-00184-RMM

Plaintiff,

v.

BENJAMIN COLE,  
BRIAN PRELLER,  
JOHN EDWARD CROWLEY,  
JONATHAN ROCKHOLT, and  
TYLER QUINTIN BENSCH,

Defendants.

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**MOTION FOR ADMISSION OF ATTORNEY JOSEPH FLYNN  
PRO HAC VICE FOR DEFENDANT JOHN EDWARD CROWLEY**

Pursuant to Criminal Local Rule 44.1, the undersigned, who serves as counsel for Jonathan Rockholt, moves for the admission *Pro Hac Vice* of attorney Joseph Flynn as counsel to defendant John Edward Crowley, and in support of this Motion states as follows:

1. As set forth in Mr. Flynn's declaration attached hereto, he is admitted to and member in good standing of the following Courts and Bars:

- a. State of Florida
- b. United States District Court for the Middle District of Florida
- c. United States District Court for the Southern District of Florida

2. Mr. Flynn agrees to abide by the Rules of the United States District Court for the District of Columbia.

3. Mr. Flynn has previously appeared *pro hac vice* in the United States District Court for the Eastern District of New York and the United States District Court for the Southern District of New York.

4. Counsel for the United States does not object to this motion.

5. The undersigned currently represents Mr. Rockholt in this matter and is not making an appearance on behalf of Mr. Crowley.

Respectfully submitted on October 20, 2022.

**LAW OFFICES OF  
HORWITZ & CITRO, P.A.**

/s/Vincent A. Citro

**VINCENT A. CITRO**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 20, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to Melanie Alsworth, Trial Attorney, 145 N. Street N.E., Suite 2e300, Washington, D.C. 20530, at [melanie.alsworth2@usdoj.gov](mailto:melanie.alsworth2@usdoj.gov), and Holly Fugiel Grosshans, Assistant U.S. Attorney, 601 D. Street N.W., Washington, D.C. 20001, at [holly.grosshans@usdoj.gov](mailto:holly.grosshans@usdoj.gov).

**LAW OFFICES OF  
HORWITZ & CITRO, P.A.**

*/s/Vincent A. Citro*

**VINCENT A. CITRO**

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