

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

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:21-cr-28-8 (APM)
)	No. 1:21-cr-28-10 (APM)
KELLY MEGGS, and)	
KENNETH HARRELSON,)	
)	
Defendants.)	

**GOVERNMENT’S OPPOSITION TO DEFENDANTS’ MOTION FOR RELEASE ON
HUMANITARIAN GROUNDS**

The Court should deny the Defendants’ motion for release on humanitarian grounds, ECF 489, for failing to comply with this Court’s November 1, 2021, minute order requiring any such motion to be “no more than five pages (excluding exhibits) establishing such a mandatory policy” of forced COVID-19 vaccination.

The Defendants’ original motion for enlargement attached an outline for a “motion for temporary restraining order and preliminary injunction by pre-trial defendants.” ECF 476 (attachment) (capitalization altered). That outline included many of the same sections in the motion that the Defendants ultimately filed, including “irreparable injury,” “balance of equities (hardships) and the public,” and “forced or coerced medical experimentation on prisoners is forbidden.” ECF 489 at 34, 40, 42 (capitalization altered).

Instead of complying with the Court’s minute order, the Defendants filed a 45-page motion (accompanied by 632 pages of exhibits) littered with the precise “bombastic arguments” and “propagating fringe views about COVID-19 or vaccinations” that this Court sought to prohibit.

Moreover, the motion appears to be seeking relief that is unavailable in this criminal case: some sort of class action status for inmates at Central Treatment Facility (CTF) detained for their role in the Capitol Breach and a preliminary injunction against some government entity. For

instance, the Defendants write, “This Court must order immediate release of January 6th Defendants.” ECF 489 at 2. And the motion seeks the following relief: “to prohibit the DOC from punishing those who do not receive Covid-19 (‘C19’) ‘vaccines’ in order to ensure that any of the three currently available experimental drugs on its menu—or indeed any other experimental drugs that may yet be added thereunto—will not be injected into Defendants without their informed and completely uninfluenced consent.” *Id.* at 5.

Defendants Harrelson and Kelly Meggs’ motion for release on humanitarian grounds should be denied.

Respectfully submitted,

Matthew M. Graves
United States Attorney
DC Bar No. 481052



Jeffrey S. Nestler
Assistant United States Attorney
D.C. Bar No. 978296
Ahmed M. Baset
Troy A. Edwards, Jr.
Louis Manzo
Kathryn Rakoczy
Assistant United States Attorneys
U.S. Attorney’s Office for the District of Columbia
555 4th Street, N.W.
Washington, D.C. 20530

/s/ Alexandra Hughes

Alexandra Hughes
Justin Sher
Trial Attorneys
National Security Division
United States Department of Justice
950 Pennsylvania Avenue
NW Washington, D.C. 20004