

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	CR No. 21-28
	)	Washington, D.C.
vs.	)	November 2, 2021
	)	1:05 p.m.
KELLY MEGGS (8),	)	
KENNETH HARRELSON (10),	)	
	)	
Defendants.	)	
_____	)	

TRANSCRIPT OF MOTION HEARING VIA ZOOM PROCEEDINGS  
BEFORE THE HONORABLE AMIT P. MEHTA  
UNITED STATES DISTRICT JUDGE

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Proceedings recorded by mechanical stenography; transcript  
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1 P R O C E E D I N G S

2 COURTROOM DEPUTY: Good afternoon, Your Honor.

3 This is Criminal Case No. 21-28, United States of America  
4 versus Defendant No. 8, Kelly Meggs, and Defendant No. 10,  
5 Kenneth Harrelson.

6 Jeffrey Nestler on behalf of the government.

7 David Wilson and Jon Moseley for Defendant  
8 Kelly Meggs.

9 Bradford Geyer for Defendant Harrelson.

10 Both defendants are appearing remotely for this  
11 hearing.

12 THE COURT: Okay, Counsel, good afternoon.

13 Mr. Harrelson, Mr. Meggs, good afternoon to the  
14 both of you.

15 If you can hear me, just please give me a  
16 thumbs-up to confirm that.

17 DEFENDANT KELLY MEGGS: (Thumbs-up.)

18 DEFENDANT KENNETH HARRELSON: (Thumbs-up.)

19 THE COURT: Okay. Terrific. Thank you, both.

20 So we're here this afternoon because a motion was  
21 filed, both by Mr. Wilson -- a motion was filed by  
22 Mr. Wilson seeking to withdraw, based upon the fact that  
23 Mr. Meggs had -- apparently, has retained new counsel,  
24 that's Mr. Moseley.

25 The question was raised about that substitution of

1 counsel, I think, by the government, because I didn't -- I  
2 had entered an order approving that substitution. I didn't  
3 realize that Mr. Moseley had already entered an appearance  
4 on behalf of Mr. Harrelson, and I think the government  
5 rightly raised concerns about the substitution. So that's  
6 what we're here for this afternoon.

7 Let me just make the following observation, and  
8 I'll get everybody's reaction: Based on the affidavit or  
9 the papers that Mr. Moseley filed, I think it was yesterday,  
10 describing his role in representing Mr. Harrelson -- let me  
11 back up:

12 I had -- after I realized that Mr. Moseley also  
13 was -- had entered an appearance on behalf of Mr. Harrelson,  
14 I had sort of two concerns; one was that if Mr. Moseley were  
15 to represent Mr. Meggs, whether there would be a risk of  
16 sort of disclosure of confidential information that  
17 Mr. Harrelson might have provided to Mr. Moseley that would  
18 create a problem, that's one; and then two is whether  
19 somehow his representation of Mr. Harrelson, particularly if  
20 it was intended to be joint, would create a conflict if he  
21 were to then represent Mr. Meggs.

22 Mr. Moseley's first -- Mr. Moseley's submission  
23 yesterday seems to have answered the first question; that  
24 is, he has represented that he hasn't had any conversations  
25 with Mr. Harrelson; that he was simply acting as someone to

1 sponsor Mr. Geyer as a pro hac into this case; has had no  
2 communications with Mr. Harrelson, and, therefore, has not  
3 received any confidences from Mr. Harrelson that might spill  
4 into any representation of Mr. Meggs, that's one.

5 And, two, if, in fact, as Mr. Moseley has  
6 represented, that his role here has been limited in terms of  
7 his representation of Mr. Harrelson, the second concern  
8 I have about the conflict is substantially mitigated.

9 So that's kind of where my thinking is. So what I  
10 wanted to give you all an opportunity to be heard; and if  
11 your thinking is different, I'd like to hear that.

12 So, Mr. Nestler, why don't we start with you, and  
13 then we'll turn to defense counsel, if there's a need for  
14 further comment.

15 Mr. Nestler.

16 MR. NESTLER: Yes, Judge.

17 And seeing what Mr. Moseley filed yesterday, the  
18 government tends to agree with Your Honor that that should  
19 address most of the concerns.

20 I think the -- what Mr. Moseley said is that he  
21 had never spoke with Mr. Harrelson, so it's unlikely he, of  
22 course, obtained any confidences from Mr. Harrelson.  
23 I suppose it's possible he obtained confidences via  
24 Mr. Geyer, and so I think that might be one thing to just  
25 clarify; that Mr. Moseley --

1 THE COURT: Right.

2 MR. NESTLER: -- did not learn anything about  
3 Mr. Harrelson's case from Mr. Geyer, which he certainly  
4 would have been entitled to if that had occurred.  
5 So I think that's the sort of the first preliminary question  
6 we had.

7 And then just as a matter of prudence, we would  
8 suggest that Mr. Harrelson and Mr. Meggs just be advised of  
9 the situation up until now and make sure they're both aware  
10 and will proceed knowingly and voluntarily, if they wanted  
11 to proceed with the counsel they wanted.

12 THE COURT: Right.

13 MR. NESTLER: That's on this one topic.

14 There is then sort of a related issue of a  
15 potential conflict with Mr. Meggs related to a civil case  
16 also pending before Your Honor with some of these same  
17 counsel, and I can flag that for Your Honor now if  
18 Your Honor would like.

19 THE COURT: Yeah, why don't you just put it out on  
20 the table now. Then we can discuss it.

21 MR. NESTLER: Sure, Judge.

22 So it's come to our attention that there's a civil  
23 suit styled *Smith versus Trump*, the case number is  
24 21-CV-2265. It's also pending in front of Your Honor.  
25 I don't know if it was a related case to this one or not or

1 if it was randomly assigned to Your Honor.

2 THE COURT: It was related to earlier suits filed  
3 arising out of the events of January 6th.

4 You can't cross-relate case number to case number,  
5 but in any event.

6 MR. NESTLER: Understood.

7 So it's also in front of Your Honor.

8 It also arises out of the events of January 6th,  
9 and Ms. Kelly Meggs is also a defendant in that case.

10 THE COURT: Right.

11 MR. NESTLER: In that case, he's represented by an  
12 attorney named Julia Haller, who is also counsel for  
13 Mr. Meggs's wife in this case. And she represents Connie  
14 Meggs in this criminal case, and Kelly Meggs in that civil  
15 case. And so that is a potential conflict. We do not know  
16 if there is a conflict or not, but that is an issue just to  
17 put out there.

18 And then another related piece of that is there  
19 was another defendant in the *Smith versus Trump* case, whose  
20 name is Zachary Rehl, R-e-h-l, who is also a criminal  
21 defendant in a case, I believe, not in front of Your Honor.  
22 And Mr. Rehl is represented by Mr. Moseley in both his  
23 criminal case, in front of a different judge in this  
24 courthouse, and also in the civil case. And so if we're  
25 filling this all in correctly, in the civil case, Mr. Meggs



1 is a defendant, he's co-defendants with Mr. Rehl, and  
2 Mr. Rehl has counsel as Mr. Moseley, who would be now  
3 counsel for Mr. Meggs in the criminal case.

4 So that's how we see it in terms of the lay of the  
5 land. I'm not sure if there are conflicts, and if there  
6 are, if they're waivable. But I wanted to put that out  
7 there as we puzzle through these various permutations.

8 THE COURT: Thank you. I appreciate it.

9 I have not -- I'll confess to not sort of  
10 carefully scrutinizing who has been entering appearances.  
11 The civil cases seem to get a filing a day in that case, so  
12 I haven't picked up on somebody overlapping you've just  
13 identified, Mr. Nestler. Thank you.

14 Before we talk about the civil cases -- I'll just,  
15 my one reaction and my observation is, I think the issue of  
16 joint representation in a civil context is less of a concern  
17 than it is in a criminal case. There are obvious  
18 constitutional issues that arise in the context of a  
19 criminal case that aren't present in a civil case, and  
20 so I think the joint representation and conflict issue in a  
21 civil case is, arguably, less significant than it is in a  
22 criminal case, but that's just my reaction.

23 Now, that said, Ms. Haller is also representing  
24 Ms. Meggs in the civil matter. You know, that, arguably --  
25 excuse me, is representing Mr. Meggs in the civil case, and

1 is representing Ms. Meggs in the criminal matter. That,  
2 arguably, raises some concerns. But in any event, we'll get  
3 to that in a moment.

4 MR. MOSELEY: Your Honor -- Oh, I'm sorry, I  
5 didn't mean do. I just thought --

6 THE COURT: That's okay.

7 Why don't we turn to you, Mr. Moseley. And  
8 I think the first order of business is: You've already  
9 confirmed in your written submission that you've not had any  
10 direct communications with Mr. Harrelson, and, therefore --  
11 at least not directly received any confidences from  
12 Mr. Harrelson.

13 I don't recall whether, in your written  
14 submission, you mentioned any indirect confidences that you  
15 may have received through Mr. Geyer.

16 MR. MOSELEY: Okay.

17 THE COURT: If you can start there.

18 MR. MOSELEY: All right.

19 Yeah, my understanding was that I was only  
20 sponsoring him, not entering an appearance. The procedures  
21 are a little bit different in every area, and maybe I think  
22 I over -- perhaps it was my error to put my name on the  
23 pleadings, because some jurisdictions require that for a  
24 sponsoring attorney, it might have created a misimpression.

25 But many of the attorneys are discussing concept

1 of strategy while we're interested in the  
2 18 U.S.C. 1512(c)(2) dismissals. So I've discussed with  
3 Brad Geyer the same kinds of legal strategies that I happen  
4 to have with other attorneys, like Julia Haller, but not --  
5 and maybe -- well, I guess there are two different issues,  
6 but the clients are here on the line, which might be  
7 important for them to speak to that, but I have dealt with  
8 legal issue -- talked about legal strategies and concepts,  
9 but not about Kenneth Harrelson himself.

10 And, you know, I --

11 THE COURT: Well, let me --

12 MR. MOSELEY: -- I'm always -- go ahead.

13 THE COURT: If I can just interrupt you,  
14 Mr. Moseley. My apologies.

15 Maybe the better -- the question is better posed  
16 directly to Mr. Geyer, who would have, in theory, been the  
17 conduit for any information.

18 So, Mr. Geyer, let me just ask you directly: To  
19 your knowledge and recollection, do you a member or have you  
20 passed on -- and obviously I'm not asking for any specifics,  
21 but have you passed on or shared any client confidences that  
22 you've learned from Mr. Harrelson with Mr. Moseley?

23 MR. GEYER: No. No, I wouldn't do that.

24 We have a weekly conference call with -- well,  
25 it's kind of evolved into a weekly conference call with all

1 the -- most of the defense counsel on this case. We discuss  
2 legal issues, Your Honor, but I would never share -- no,  
3 that didn't happen.

4 THE COURT: Okay.

5 If the answer is no, and I think that's what  
6 Mr. Nestler was asking, that's a fair question.

7 If the answer is no, then I think that does  
8 address what I sort of framed this issue on, which is a  
9 concern of passing confidences along or having confidences  
10 disclosed in a new representation.

11 So, Mr. Nestler, does that satisfy the government  
12 at least that issue one is taken off the table?

13 MR. NESTLER: Yes.

14 THE COURT: Okay.

15 I guess the other issue then is just to confirm  
16 that Mr. Meggs and Mr. Harrelson are aware of this  
17 situation. Both are present here and, therefore, have been  
18 listening in.

19 Mr. Harrelson is the one who, in theory, is losing  
20 a lawyer, although it doesn't sound like Mr. Moseley really  
21 has intended to enter an appearance on behalf of  
22 Mr. Harrelson.

23 But, nevertheless, let me just turn to  
24 Mr. Harrelson and make sure he understands what's happening  
25 and that -- what's happened here is that the lawyer,

1 Mr. Moseley, who has sponsored your current lawyer,  
2 Mr. Geyer, to serve as your lawyer in this case, is asking  
3 to become counsel for Mr. Meggs.

4 Do you understand that, Mr. Harrelson?

5 DEFENDANT HARRELSON: Yes.

6 THE COURT: Okay.

7 And do you have any objection or concern --  
8 do you have any objection to that, Mr. Harrelson?

9 DEFENDANT HARRELSON: No, sir.

10 THE COURT: Do you have any questions or concerns  
11 about that, Mr. Harrelson?

12 DEFENDANT HARRELSON: Not at this time,  
13 Your Honor.

14 THE COURT: Okay.

15 Then let me just turn to Mr. Meggs.

16 Mr. Meggs, you too have been on during these  
17 proceedings, and I understand you wish to retain Mr. Moseley  
18 as your counsel; is that right; sir?

19 DEFENDANT KELLY MEGGS: Yes, Your Honor.

20 THE COURT: And your lawyer, Mr. Moseley, has  
21 served as counsel in some capacity in this case for  
22 Mr. Harrelson; at a minimum, he's sponsored Mr. Geyer as a  
23 lawyer for Mr. Harrelson in this case.

24 You're aware of that, sir?

25 DEFENDANT KELLY MEGGS: Yes, Your Honor.

1 THE COURT: And are you prepared to, knowing that,  
2 move forward with Mr. Moseley as your counsel?

3 DEFENDANT KELLY MEGGS: Yes, Your Honor.

4 THE COURT: Okay.

5 Mr. Nestler, I don't know if that's sufficient in  
6 your mind.

7 You know, I don't think I can be in a position to  
8 provide advice in terms of ethics and conflicts, but I think  
9 given the representations that have been made, it's not --  
10 I don't think we need a conflicts counsel, as we've had in  
11 the case with Mr. Meggs and his wife, for example, to advise  
12 these two gentlemen. I think what we've done so far is  
13 sufficient, but I'm happy to hear from you if you think  
14 otherwise.

15 MR. NESTLER: I believe that's sufficient for the  
16 issue about Mr. Harrelson's pro hac sponsor.

17 THE COURT: Okay.

18 MR. NESTLER: So I believe that's sufficient for  
19 the first two issues Your Honor addressed.

20 I think the civil case might pose some thornier  
21 questions, but I think that's -- we're satisfied with that.

22 THE COURT: Okay.

23 MR. MOSELEY: May I add to that, though?

24 Because in consultations, I do believe that  
25 we will -- that we'll have Brad Geyer find another sponsor.

1 I've never heard of that procedure, how that would happen,  
2 but I think --

3 THE COURT: Well, I don't know that -- I mean,  
4 it's up to you, but I don't know that we need another  
5 sponsor.

6 I mean, I've never read our Local Rules to require  
7 a sponsoring lawyer to enter an appearance. They just  
8 simply need to have a sponsor to have an out-of-jurisdiction  
9 lawyer appear pro hac, and so I don't -- and I don't think  
10 there's any currency that's required by a sponsor, so  
11 I don't think that's necessary.

12 MR. MOSELEY: Well, I just want to have it on the  
13 record that I think it's probably better for me to do that,  
14 to ask -- to have another person sponsor him.

15 THE COURT: You know, he's already been admitted,  
16 so I don't think there's any further sponsorship required.

17 I mean, Mr. Geyer may do something at some point  
18 in this case that requires further sponsorship, but that  
19 hasn't happened yet.

20 All right. So I think that means, Mr. Wilson, you  
21 are relieved of your duties. I'll accept Mr. Moseley's  
22 entry of his appearance, and, Mr. Wilson, you'll be relieved  
23 of your duties in representing Mr. Meggs. I trust that  
24 you'll provide whatever file you have, Mr. Moseley, and I  
25 thank you for your representation of Mr. Meggs. And if

1 there's anything you want to add before you sign off, I'm  
2 happy to hear from you.

3 MR. WILSON: Thank you very much. Thank you.

4 THE COURT: All right. Thank you, Mr. Wilson.

5 Okay. Let's then turn to this issue of the civil  
6 representations.

7 I think the only one we can really address is  
8 Mr. Moseley's representation of Zach Rehl. But even then, I  
9 don't know if that's something we can address in Mr. Rehl's  
10 absence, and, frankly, I'm not sure it's something that is  
11 addressable in this case. In other words, I mean, I suppose  
12 the argument could be made that because he represents  
13 Mr. Rehl in the civil case and Mr. Harrelson is a defendant  
14 in the civil case, that he can't represent Mr. Harrelson in  
15 the criminal case, but I'm happy to hear counsel's thoughts  
16 about that issue.

17 MR. MOSELEY: Well -- yeah.

18 THE COURT: Let me just -- what's Mr. Harrelson's  
19 status in the criminal case? Is he -- I mean, in the civil  
20 case? Is he a defendant in that case?

21 MR. GEYER: Your Honor, my understanding is --  
22 I know literally nothing about this. I do not think that  
23 he's a part of that.

24 Can I ask Mr. Harrelson if he knows anything?

25 THE COURT: That's all right. You don't need to



1 ask. We can check the docket.

2 MR. NESTLER: It was Kelly Meggs who's the  
3 defendant in the civil case, Judge --

4 THE COURT: Right.

5 MR. NESTLER: -- not Mr. Harrelson.

6 THE COURT: Oh, right, right, right.

7 So Mr. Moseley is now going to represent  
8 Mr. Meggs.

9 And, Mr. Moseley, I mean, let me just ask, are  
10 you -- is it the intention of your client to also have you  
11 represent him in the civil matter or just in the criminal  
12 case?

13 MR. MOSELEY: Well, that's certainly not the plan.

14 I mean, Mr. Nestler is raising the question, but  
15 the current arrangement is for Julia Haller to represent him  
16 in the civil lawsuit.

17 And I just know that I've heard the comment that  
18 the Meggs financially would be affected the same. They  
19 have, you know -- but, again, she's not here, and I don't  
20 know about -- but it's not my intention to be involved in  
21 that, although, you know, I realize that questions have been  
22 raised. So I don't know what to think about that.

23 THE COURT: Well, Mr. Moseley --

24 MR. MOSELEY: I mean, I don't --

25 THE COURT: Well, have you looked into this or

1     gotten any guidance from your office as to whether -- to  
2     what extent this presents a conflict that's waivable or not  
3     waivable?

4             MR. MOSELEY:   The conflict being between the civil  
5     and the criminal case; is that correct?

6             I mean, because I don't think I would -- oh --  
7     I never contemplated being involved in the civil lawsuit  
8     with Kelly Meggs, so I haven't really given that any  
9     thought.

10            THE COURT:   Yeah, I think the conflict, frankly,  
11     is less -- I think the conflict, in a sense, doesn't involve  
12     Mr. Moseley, it involves Haller, and whether she can kind of  
13     play the dual-role hat of representing Mr. Meggs in the  
14     civil case and representing his wife in the criminal case.  
15     I mean, that's the conflict.

16            And absent -- without Ms. Haller here and without  
17     Ms. Meggs here, you know, I don't know that I can  
18     appropriately address the conflict, even if it's one that  
19     needs to be addressed, even if just to get consent,  
20     particularly if we need some kind of waivers.

21            MR. MOSELEY:   Yes.

22            Your Honor, I mean -- because also a lot of the  
23     defendants in the civil case before you are asking for a  
24     stay.

25            THE COURT:   Right.

1 MR. MOSELEY: And I don't think I would want to do  
2 both simultaneously just because of the workload in this  
3 case.

4 THE COURT: Okay.

5 MR. MOSELEY: So I helped Zachary Rehl not have a  
6 default and then asked for a stay. And everybody -- there's  
7 a lot of motions in front of Your Honor for -- precisely  
8 because it's a criminal case. So I don't know how that  
9 plays out, but just FYI.

10 THE COURT: Yeah.

11 I mean, I don't think your representation of  
12 Mr. Rehl presents a conflict with your representation of  
13 Mr. Meggs.

14 I mean, at least -- you know, maybe Mr. Nestler  
15 might have a better sense of that than I would, if he thinks  
16 that there's some conflict between those two individuals,  
17 but I'm certainly not aware of any. And I don't know much  
18 at all about Mr. Rehl's conduct, let alone his relationship,  
19 if any, to Mr. Meggs.

20 MR. MOSELEY: But, like I say, if the civil  
21 lawsuit is ready to roar ahead, I would not want to  
22 personally handle both because of just the workload issue  
23 and that sort of thing.

24 THE COURT: Mr. Nestler, are you aware of any  
25 potential ties between Mr. Meggs and Mr. Rehl that could

1 give rise to conflict issues?

2 MR. NESTLER: I'm not aware of any potential ties.

3 I'm aware of what the complaint in the case says  
4 and seeking to hold some individuals involved in January 6th  
5 liable for some of the damages that day.

6 And so there could be an incentive for Mr. Rehl  
7 and/or Mr. Meggs to point the finger at one another if that  
8 case were to proceed. And I think if that were to occur,  
9 that would pose a conflict for Mr. Moseley representing  
10 Mr. Rehl in the civil case and Mr. Meggs in the criminal  
11 case.

12 THE COURT: Right.

13 MR. NESTLER: I don't know what's going to happen  
14 there or what their defenses are going to be, obviously.  
15 All I know is the allegations in the complaint.

16 THE COURT: Right.

17 I mean, it's -- yeah.

18 Although we're sort of a long ways away, I think,  
19 in that case from having any defendant make a statement that  
20 might be used by the government and prosecutors named here  
21 Mr. Meggs here or Mr. Rehl in his case.

22 Okay.

23 MR. MOSELEY: Well, Your Honor, that's pretty much  
24 the reason for the stay, the request for a stay.

25 THE COURT: Yeah, I know, I -- I know.

1 Well, I guess what we ought to do is as follows:

2 Let me just say: Mr. Nestler, what is your  
3 request then? And to the extent that you have been given  
4 guidance or thought through this issue in terms of  
5 Ms. Haller, what is the current thinking of your office and  
6 your team?

7 MR. NESTLER: We believe that if Ms. Haller and  
8 Mrs. Meggs were present in front of Your Honor and  
9 Your Honor had a similar colloquy that you just had with  
10 Mr. Meggs and Mr. Harrelson, that if there was any conflict,  
11 that they could waive the conflict. They just need to be  
12 aware of it so they can do this knowingly. I'm not sure  
13 about everyone's status about how aware they are.

14 THE COURT: The only issue with -- I mean, again,  
15 I didn't think in this case there was a real concern about  
16 conflict.

17 I always hate bringing lawyers in to serve as  
18 conflicts counsel just because it's cumbersome, but I don't  
19 think a judge ought to be in a position of trying to advise  
20 individuals about all the potential conflicts that could  
21 arise from these types of representations and then getting a  
22 waiver on the record. It risks being incomplete, or,  
23 frankly, risks being unduly influencing of the individuals,  
24 and so I don't want to put myself in that position.

25 Let me see what I can do. I probably should get a

1 conflicts counsel to advise both me and those who are  
2 involved here about potential conflicts and get some sense  
3 of whether this is waivable, if we need waivers get those on  
4 the record, et cetera.

5 So let me go ahead and do that. I'll figure out  
6 who I can call on to do this. But give me a few days and  
7 I'll figure that out and we'll have the conflicts counsel  
8 reach out to everyone.

9 MR. GEYER: Your Honor, you got to the point where  
10 I feel like I should disclose something. It's a non-issue,  
11 but just so I get it on the record real quick.

12 Some time back when I was talking to Mr. Moseley,  
13 he mentioned he needed a power of attorney for his client,  
14 Jacob Rehl [sic]. I went in to Philadelphia and met with  
15 him for about ten minutes so that he could sign this -- it  
16 was a power of attorney for -- so his partner could, you  
17 know, do some financial stuff.

18 But we're kind of at the point where I feel like  
19 I should just disclose that. Did not discuss his case;  
20 I know nothing about that case. It was an accommodation;  
21 I would do that professional courtesy for anybody.

22 THE COURT: Okay.

23 Yeah. I mean, that doesn't strike me as an issue.

24 So I think the way to proceed is this. I'll see  
25 if I can line up conflicts counsel to talk to the various

1 counsel that are affected by these representations, and then  
2 I'll -- once those consultations have been had, we'll have  
3 to just circle back to get this resolved on the record.

4 Does that sound acceptable to everyone?

5 MR. MOSELEY: Yes, Your Honor.

6 MR. NESTLER: Yes for the government. Thank you.

7 THE COURT: Thank you, everyone.

8 And is there anything else we need to take up this  
9 afternoon?

10 MR. MOSELEY: No. Thank you, Your Honor.

11 MR. GEYER: Thank you. Have a nice day.

12 THE COURT: Thank you, everyone.

13 (Proceedings concluded at 1:31 p.m.)  
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C E R T I F I C A T E

I, William P. Zaremba, RMR, CRR, certify that the foregoing is a correct transcript from the record of proceedings in the above-titled matter.

Please note: This hearing occurred during the COVID-19 pandemic and is therefore subject to the technological limitations of court reporting remotely.

Date: November 4, 2021      /S/ William P. Zaremba

William P. Zaremba, RMR, CRR



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	<b>I</b> <b>I believe</b> [3] 8/21 14/15 14/18 <b>I can</b> [5] 7/17 14/7 18/17 21/25 22/6 <b>I didn't</b> [2] 5/1 5/2 <b>I don't</b> [11] 7/25 14/7 14/10 15/9 15/11 15/16 17/24 18/6 19/1 19/11 21/18 <b>I don't recall</b> [1] 10/13 <b>I guess</b> [3] 11/5 12/15 21/1 <b>I have</b> [3] 6/8 9/9 11/7 <b>I haven't</b> [2] 9/12 18/8 <b>I just</b> [1] 17/17 <b>I know</b> [4] 16/22 20/15 20/25 22/20 <b>I mean</b> [12] 15/3 15/17 16/11 16/19 17/9 18/6 18/15 18/22 19/11 19/14 20/17 22/23 <b>I never</b> [1] 18/7 <b>I should</b> [2] 22/10 22/19 <b>I suppose</b> [1] 6/23 <b>I think</b> [18] 5/1 5/4 5/9 6/20 9/15 10/8 10/21 12/5 12/7 14/8 14/12 14/20 14/21 15/2 15/13 16/7 20/8 20/18 <b>I understand</b> [1] 13/17 <b>I was</b> [1] 10/19 <b>I went</b> [1] 22/14 <b>I would</b> [2] 19/1 22/21	<b>I wouldn't</b> [1] 11/23 <b>I'd</b> [1] 6/11 <b>I'll</b> [8] 5/8 9/9 9/14 15/21 22/5 22/7 22/24 23/2 <b>I'm</b> [12] 9/5 10/4 11/12 11/20 14/13 16/1 16/10 16/15 19/17 20/2 20/3 21/12 <b>I'm not</b> [2] 11/20 20/2 <b>I'm not sure</b> [2] 9/5 21/12 <b>I'm sorry</b> [1] 10/4 <b>I've</b> [4] 11/2 15/1 15/6 17/17 <b>identified</b> [1] 9/13 <b>important</b> [1] 11/7 <b>incentive</b> [1] 20/6 <b>incomplete</b> [1] 21/22 <b>indirect</b> [1] 10/14 <b>individuals</b> [4] 19/16 20/4 21/20 21/23 <b>influencing</b> [1] 21/23 <b>information</b> [2] 5/16 11/17 <b>intended</b> [2] 5/20 12/21 <b>intention</b> [2] 17/10 17/20 <b>interested</b> [1] 11/1 <b>interrupt</b> [1] 11/13 <b>involve</b> [1] 18/11 <b>involved</b> [4] 17/20 18/7 20/4 22/2 <b>involves</b> [1] 18/12 <b>is</b> [62] <b>is that correct</b> [1] 18/5 <b>is there</b> [1] 23/8 <b>issue</b> [16] 7/14 8/16 9/15 9/20 11/8 12/8 12/12 12/15 14/16 16/5 16/16 19/22 21/4 21/14 22/10 22/23 <b>issues</b> [5] 9/18 11/5 12/2 14/19 20/1 <b>it</b> [24] 5/9 5/20 7/19 7/20 7/25 8/1 8/2 8/8 9/4 9/8 9/17 9/21 10/22 10/24 12/20 15/12 17/2 17/10 18/12 21/12 21/22 22/11 22/15 22/20 <b>it's</b> [16] 6/21 6/23 7/22 7/24 8/7 11/25 14/9 15/4 15/13 16/10 17/20 18/18 19/8 20/17 21/18 22/10	
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<p><b>J</b></p> <p><b>Jonathon [1]</b> 2/6  <b>jonmoseley.com [1]</b> 2/10  <b>judge [6]</b> 1/11 6/16 7/21 8/23 17/3 21/19  <b>Julia [3]</b> 8/12 11/4 17/15  <b>Julia Haller [1]</b> 11/4  <b>jurisdiction [1]</b> 15/8  <b>jurisdictions [1]</b> 10/23  <b>just [33]</b></p> <hr/> <p><b>K</b></p> <p><b>KELLY [8]</b> 1/6 2/2 4/4 4/8 8/9 8/14 17/2 18/8  <b>Kelly Meggs [1]</b> 4/8  <b>KENNETH [4]</b> 1/7 2/11 4/5 11/9  <b>kind [5]</b> 6/9 11/25 18/12 18/20 22/18  <b>kinds [1]</b> 11/3  <b>know [27]</b>  <b>knowing [1]</b> 14/1  <b>knowingly [2]</b> 7/10 21/12  <b>knowledge [1]</b> 11/19  <b>knows [1]</b> 16/24</p> <hr/> <p><b>L</b></p> <p><b>land [1]</b> 9/5  <b>LAW [2]</b> 2/3 2/7  <b>lawsuit [3]</b> 17/16 18/7 19/21  <b>lawyer [8]</b> 12/20 12/25 13/1 13/2 13/20 13/23 15/7 15/9  <b>lawyers [1]</b> 21/17  <b>lay [1]</b> 9/4  <b>LCC [1]</b> 2/12  <b>learn [1]</b> 7/2  <b>learned [1]</b> 11/22  <b>least [3]</b> 10/11 12/12 19/14  <b>legal [4]</b> 11/3 11/8 11/8 12/2  <b>less [3]</b> 9/16 9/21 18/11  <b>let [12]</b> 5/7 5/10 11/11 11/18 12/23 13/15 16/18 17/9 19/18 21/2 21/25 22/5  <b>Let's [1]</b> 16/5  <b>liable [1]</b> 20/5  <b>like [7]</b> 6/11 7/18 11/4 12/20 19/20 22/10 22/18  <b>limitations [1]</b> 24/7  <b>limited [1]</b> 6/6  <b>line [2]</b> 11/6 22/25  <b>listening [1]</b> 12/18  <b>literally [1]</b> 16/22  <b>little [1]</b> 10/21  <b>Local [1]</b> 15/6  <b>long [1]</b> 20/18  <b>looked [1]</b> 17/25  <b>losing [1]</b> 12/19  <b>lot [2]</b> 18/22 19/7</p>	<p><b>M</b></p> <p><b>made [2]</b> 14/9 16/12  <b>make [4]</b> 5/7 7/9 12/24 20/19  <b>many [1]</b> 10/25  <b>matter [5]</b> 7/7 9/24 10/1 17/11 24/4  <b>may [3]</b> 10/15 14/23 15/17  <b>maybe [4]</b> 10/21 11/5 11/15 19/14  <b>me [18]</b> 4/15 4/15 5/7 5/10 9/25 11/11 11/18 12/23 13/15 15/13 16/18 17/9 21/2 21/25 22/1 22/5 22/6 22/23  <b>mean [17]</b> 10/5 15/3 15/6 15/17 16/11 16/19 17/9 17/14 17/24 18/6 18/15 18/22 19/11 19/14 20/17 21/14 22/23  <b>means [1]</b> 15/20  <b>mechanical [1]</b> 3/6  <b>MEGGS 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19/18  <b>Mr. Wilson [5]</b> 4/21 4/22 15/20 15/22 16/4  <b>Mrs. [1]</b> 21/8  <b>Mrs. Meggs [1]</b> 21/8  <b>Ms. [8]</b> 8/9 9/23 9/24 10/1 18/16 18/17 21/5 21/7  <b>Ms. Haller [4]</b> 9/23 18/16 21/5 21/7  <b>Ms. Kelly [1]</b> 8/9  <b>Ms. Meggs [3]</b> 9/24 10/1 18/17  <b>much [3]</b> 16/3 19/17 20/23  <b>my [10]</b> 6/9 9/15 9/15 9/22 10/19 10/22 10/22 11/14 16/21 17/20  <b>myself [1]</b> 21/24</p> <hr/> <p><b>N</b></p> <p><b>name [2]</b> 8/20 10/22  <b>named [2]</b> 8/12 20/20  <b>necessary [1]</b> 15/11  <b>need [9]</b> 6/13 14/10 15/4 15/8 16/25 18/20 21/11 22/3 23/8  <b>needed [1]</b> 22/13  <b>needs [1]</b> 18/19  <b>Nestler [12]</b> 1/13 4/6 6/12 6/15 9/13 12/6 12/11 14/5 17/14 19/14 19/24 21/2  <b>never [5]</b> 6/21 12/2 15/1 15/6 18/7  <b>nevertheless [1]</b> 12/23  <b>new [2]</b> 4/23 12/10  <b>nice [1]</b> 23/11  <b>NJ [1]</b> 2/13  <b>no [12]</b> 1/4 4/3 4/4 4/4 6/1 11/23 11/23 12/2 12/5 12/7 13/9 23/10  <b>non [1]</b> 22/10  <b>non-issue [1]</b> 22/10  <b>not [30]</b>  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7/19 8/3 8/8 8/17 9/6 15/8 19/9 22/5 22/7 22/8  <b>over [1]</b> 10/22  <b>overlapping [1]</b> 9/12</p> <hr/> <p><b>P</b></p> <p><b>p.m [2]</b> 1/6 23/13  <b>pandemic [1]</b> 24/6  <b>papers [1]</b> 5/9  <b>Parkway [1]</b> 2/8  <b>part [1]</b> 16/23  <b>particularly [2]</b> 5/19 18/20  <b>partner [1]</b> 22/16  <b>passed [2]</b> 11/20 11/21  <b>passing [1]</b> 12/9  <b>pending [2]</b> 7/16 7/24  <b>perhaps [1]</b> 10/22  <b>permutations [1]</b> 9/7  <b>person [1]</b> 15/14  <b>personally [1]</b> 19/22  <b>Philadelphia [1]</b> 22/14  <b>picked [1]</b> 9/12  <b>piece [1]</b> 8/18  <b>Plaintiff [1]</b> 1/4  <b>plan [1]</b> 17/13  <b>play [1]</b> 18/13  <b>plays [1]</b> 19/9  <b>pleadings [1]</b> 10/23  <b>please [2]</b> 4/15 24/5  <b>point [4]</b> 15/17 20/7 22/9 22/18  <b>pose [2]</b> 14/20 20/9  <b>posed [1]</b> 11/15  <b>position [3]</b> 14/7 21/19 21/24  <b>possible [1]</b> 6/23  <b>potential [6]</b> 7/15 8/15 19/25 20/2 21/20 22/2  <b>power [2]</b> 22/13 22/16  <b>precisely [1]</b> 19/7  <b>preliminary [1]</b> 7/5</p>	<p><b>prepared [1]</b> 14/1  <b>present [3]</b> 9/19 12/17 21/8  <b>presents [2]</b> 18/2 19/12  <b>pretty [1]</b> 20/23  <b>Prettyman [1]</b> 3/4  <b>pro [3]</b> 6/1 14/16 15/9  <b>probably [2]</b> 15/13 21/25  <b>problem [1]</b> 5/18  <b>procedure [1]</b> 15/1  <b>procedures [1]</b> 10/20  <b>proceed [4]</b> 7/10 7/11 20/8 22/24  <b>proceedings [5]</b> 1/10 3/6 13/17 23/13 24/4  <b>produced [1]</b> 3/7  <b>professional [1]</b> 22/21  <b>prosecutors [1]</b> 20/20  <b>provide [2]</b> 14/8 15/24  <b>provided [1]</b> 5/17  <b>prudence [1]</b> 7/7  <b>put [5]</b> 7/19 8/17 9/6 10/22 21/24  <b>puzzle [1]</b> 9/7</p> <hr/> <p><b>Q</b></p> <p><b>question [6]</b> 4/25 5/23 7/5 11/15 12/6 17/14  <b>questions [3]</b> 13/10 14/21 17/21  <b>quick [1]</b> 22/11</p> <hr/> <p><b>R</b></p> <p><b>R-e-h-l [1]</b> 8/20  <b>raised [3]</b> 4/25 5/5 17/22  <b>raises [1]</b> 10/2  <b>raising [1]</b> 17/14  <b>randomly [1]</b> 8/1  <b>reach [1]</b> 22/8  <b>reaction 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