

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

**Case No.: 17-cr-00232**

UNITED STATES OF AMERICA	)
	)
Plaintiff,	)
	)
Vs.	)
	)
MUCHAEL FLYN	)
	)
Defendant[s],	)
	)
_____	/

**MOTION FOR LEAVE TO FILE OF AN AMICUS CURIAE BRIEF**

**COMES NOW**, Julio Martinez, Joshua Macias, Vadimir Lements, indivially and as directors of We Who Served-VSO, a nonprofit Association organized under the Laws of the Commonwealth of Virginia, Vets for Trump, an unincorporated national association with chapters in all 50 states, jointly and with approximately over 1,000,000 members, pursuant to Local Rule 7(o) and the general order of the court, under docket # 211 file the instant motion for leave to file an Amicus Curiae Brief. In support the appearing parties state and pray as follows:

**GROUND FOR RELIEF**

1. The court has granted by way of docket # 211, MICHAEL T. FLYNN granting 209 Motion to File Amicus Brief. The court has issued a briefing

- schedule, the instant motion for leave to file Amicus Curiae Brief attempts to satisfy the briefing schedule in all regards.
2. The movants are a nonprofit organization of veterans, and individuals that have sworn support the United States its constitution and the code of military justice, as retired members of the armed forces of the United States. The individual movants are all former military veterans that have served the United States and have sworn to protect defend the constitution of the United States.
  3. The matters asserted herein are relevant to the disposition of the case insofar as the court has issued an order to accept Amicus Curiae Brief.
  4. The appearing parties respectfully pray to brief the court on the following issues: A) whether or not to consider criminal contempt as against defendant General Michael T. Flynn; B) Whether the court should grant defendant's Flynn's motion to set aside the plea agreement; C) whether the court should grant the United States motion to dismiss the case.

**WHEREFORE** the appearing parties respectfully pray to this Honorable Court to grant leave to file the attached Amicus Curiae brief in support of dismissing the case.

Respectfully submitted,

**NAVARRO\ McKOWN**

\_\_\_\_\_/S./\_\_\_\_\_  
**Lorenzo J. Palomares, Esq.**

**DC BAR 503044**

**Luis Navarro, Esq**

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**DISCLOSURE OF CORPORATE AFFILIATIONS AND FINANCIAL INTERESTS**

**LCvR7.1**

In all civil or agency cases where a corporation is a party or intervenor, counsel of record for that party or intervenor shall file a certificate listing any parent, subsidiary or affiliate of that parties or intervenor. We Who Served-VSO is a nonprofit organization organized under the laws of the Commonwealth of Virginia, Vets for Trump is an unincorporated organization organized under the laws of the Commonwealth of Virginia, neither has a parent or associated corporation or parent organization. The remaining movants are all individual citizens of the Commonwealth of Virginia and the State of Florida, they are all veterans of the United States Armed Forces, having all served with distinction.

**DISCLOSURE OF CORPORATE AFFILIATIONS AND FINANCIAL INTERESTS**

**LCvR 26.1**

I, the undersigned, counsel of record for Who Served-VSO a nonprofit organization organized under the laws of the Commonwealth of Virginia and Vets for Trump an unincorporated organization organized under the laws of the Commonwealth of Virginia, certify that to the best of my knowledge and belief, there are no parent companies, subsidiaries, affiliates, or companies which own at least 10% of the stock of Vets for Trump which have any outstanding securities in the hands of the public.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this day of filing the undersigned filed the motion for leave to file Amicus Brief to:

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