

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	
	:	<b>CRIMINAL NO. 22-CR-96 (CKK)</b>
<b>LAUREN HANDY,</b>	:	
	:	
<b>JONATHAN DARNELL,</b>	:	
	:	
<b>JAY SMITH (aka JUANITO PICHARDO),</b>	:	
	:	
<b>PAULETTE HARLOW,</b>	:	
	:	
<b>JEAN MARSHALL,</b>	:	
	:	
<b>JOHN HINSHAW,</b>	:	
	:	
<b>HEATHER IDONI,</b>	:	
	:	
<b>WILLIAM GOODMAN, and</b>	:	
	:	
<b>JOAN BELL,</b>	:	
	:	
<b>Defendants.</b>	:	

**GOVERNMENT’S RESPONSE TO COURT’S JUNE 13, 2022, MINUTE ORDER**

On June 13, 2022, this Court directed the Government to file by July 26, 2022, its position on the grouping of the Defendants for trial and trial scheduling. The Government proposes that one trial include Defendants Harlow, Marshall, Hinshaw, Smith and Darnell, and that the other trial include Defendants Handy, Bell, Goodman and Idoni. The Government takes no position on which trial goes first.

The Government’s proposed grouping of defendants will streamline the presentation of evidence so that the trials can proceed expeditiously. The Defendants in this case are charged with a conspiracy against rights for their forceful efforts to obstruct access to reproductive health services clinic in the District of Columbia. On March 30, 2022, a federal grand jury in the District

of Columbia returned a two-count indictment charging them with a conspiracy against rights, in violation of 18 U.S.C. § 241, and a violation of the Freedom of Access to Clinic Entrances Act, in violation of 18 U.S.C. § 248. ECF No. 1. According to the indictment, the Defendants planned and worked together to create a blockade at a reproductive health clinic. Several Defendants traveled to the District of Columbia from out of state to participate in the pre-planned blockade. The evidence is expected to show that Defendants Smith and Hinshaw traveled together, and that Defendants Bell and Goodman traveled together. The proposed grouping of the defendants will keep the travel partners in the same trial.

Further, Defendants Handy, Smith, Harlow, Marshall, Hinshaw, Idoni, Goodman, and Bell forcefully entered the clinic and used their bodies, chairs, and chains to prevent the clinic from providing, and patients from obtaining, reproductive health services. Defendants Marshall and Smith entered the clinic first and Defendants Goodman and Idoni blocked the clinic doors. The proposed grouping of the defendants will further streamline the presentation of evidence by keeping these defendants (Marshall/Smith and Goodman/Idoni) paired together.

Finally, at the hearing Defendants' counsel requested that Defendants Marshall and Harlow be grouped together. The Government has no objection to this, and this proposal honors that request.

The Government further proposes a pretrial scheduling order, attached as Exhibit A, that would complete pretrial briefing for all defendants in March 2023, so that both trials could be set shortly thereafter.

Respectfully submitted,

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