

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT LOUISVILLE

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|---------------------------|---|----------------------------|
| UNITED STATES OF AMERICA, |) | Case No. 3:22-cr-00085-CRS |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | [Fed. R. Crim. P. 48(a)] |
| |) | |
| JOSHUA JAYNES and |) | |
| KYLE MEANY, |) | |
| |) | |
| Defendants. |) | |
| |) | |
| |) | |

UNITED STATES’ MOTION TO DISMISS

The United States of America, by and through its counsel of record, hereby moves to dismiss this case, with prejudice, as against defendants Joshua Jaynes and Kyle Meany pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure.

On August 3, 2023, the Government filed the Indictment in this case against defendants Jaynes and Meany. (Dkt. 1.) On August 22, 2024, in response to a defense motion to dismiss (*i.e.*, strike) the felony allegations from Count One of the Indictment, which alleged a violation of 18 U.S.C. § 242 (Deprivation of Rights), the Court issued an order striking the felony allegations and thereby reduced Count One from a felony to a misdemeanor. (Dkt. 49.) The Government did not pursue an appeal and instead opted to seek a Superseding Indictment.

On October 1, 2024, the Government filed a Superseding Indictment that realleged the felony allegations in Count One’s § 242 charge and attempted to address

the prior deficiencies with additional factual allegations. (Dkt. 52.) On August 20, 2025, in response to another defense motion to dismiss/strike, the Court issued an order that struck Count One’s felony allegations from the Superseding Indictment, reducing that charge again from a felony to a misdemeanor. (Dkt. 69.)

In light of the foregoing proceedings, the Government undertook a further review of this matter. Based on that review, and in the exercise of its discretion, the Government has determined that this case should be dismissed in the interest of justice pursuant to Rule 48(a).

DEFENDANTS’ POSITION RE. MOTION

The Government advised the attorneys for defendants Jaynes and Meany of the Government’s intent to file this motion and to ask for their position on the matter. Counsel for both Jaynes and Meany advised the Government that defendants do not oppose this motion.

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NOTICE TO TAYLOR FAMILY

The Government has provided notice of this motion in accordance with 18 U.S.C. § 3771(a).

DATED: March 20, 2026.

Respectfully submitted,

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

ROBERT J. KEENAN
Acting Deputy Assistant Attorney General
Civil Rights Division

/s/ J. Katie Neff

J. KATIE NEFF
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Attorneys for Plaintiff
UNITED STATES OF AMERICA

CERTIFICATE OF SERVICE

I hereby certify that, on March 20, 2026, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a Notice of Electronic Filing to all parties.

/s/ J. Katie Neff

J. KATIE NEFF

Civil Rights Division