

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
DELTA DIVISION

UNITED STATES OF AMERICA            )  
  )  
v.    )  
  )  
BRYAN DONALDSON                                )  
RANDLE BLAIR                                        )

2:21CR00158 BSM

**MOTION TO DISMISS INDICTMENT**

The United States of America, through Jonathan D. Ross, United States Attorney for the Eastern District of Arkansas, and Kristin H. Bryant, Assistant U.S. Attorney for said district, and for its Motion states:

Defendants Donaldson and Blair have agreed to plead guilty to charges in state court in exchange for the United States’ request for dismissal of the pending charges against them in this matter. In the event Donaldson or Blair does not plead guilty to the state court charges, the United States may refile the federal charges against either or both as set forth in the Indictment.

Pursuant to Federal Rule of Criminal Procedure 48, the United States prays that this Court dismiss the Indictment, without prejudice, but only as to defendants Bryan Donaldson and Randle Blair.

Respectfully submitted,

JONATHAN D. ROSS  
United States Attorney

By: Kristin H. Bryant  
AR Bar No. 2009156  
Assistant United States Attorney  
P. O. Box 1229  
Little Rock, AR 72203  
Telephone No. (501) 340-2600  
Email: Kristin.Bryant@usdoj.gov