

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Case No. 21-cr-000165-RM

UNITED STATES OF AMERICA,

Plaintiff,

v.

2. CHANDLER SIMBECK,

Defendant.

**GOVERNMENT'S MOTION TO DISMISS COUNT 13
as to DEFENDANT FOREMAN ONLY**

The United States of America, by and through Robert Brown, Assistant United States Attorney, moves to dismiss count 13 as to defendant Chandler Simbeck under the terms of the plea agreement.

Respectfully submitted,

COLE FINEGAN
United States Attorney

By: s/ Robert Brown
Robert Brown
Assistant United States Attorney
1801 California Street, Suite 1600
Denver, Colorado 80202
Telephone: (303) 454-0100
E-mail: robert.brown5@usdoj.gov
Attorney for the Government

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of December 2023, I electronically filed the **GOVERNMENT'S MOTION TO DISMISS** with the Clerk of Court using the CM/ECF system which will transmit the document to opposing counsel.

s/_____
Robert Brown
United States Attorney's Office