

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

UNITED STATES OF AMERICA

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Case No. 1:21-cr-35-RC

v.

JEFFREY SABOL

Defendant

**DEFENDANT JEFFREY SABOL'S MOTION TO AUTHORIZE AND EXPEDITE THE
DISTRICT OF COLUMBIA DEPARTMENT OF CORRECTIONS DISCLOSURE OF
VIDEO FOOTAGE**

Defendant Jeffrey Sabol (hereinafter "defendant" or "Mr. Sabol"), though undersigned counsel, respectfully submits this motion to receive video and/or audio footage from the District of Columbia Department of Corrections and requests Your Honor sign the attached Protective Order.

FACTS

On or about February 7, 2023, defendant was involved in an incident at the Department of Corrections, D.C. Jail, resulting in a Disciplinary Report hearing. The incident and hearing have led to defendant being moved to a different area of the jail without any access to phone or tablet communication.

After the hearings, but before being moved, my client informed me that there was Body Worn Camera footage from the incident, as well as audio/visual footage from the hearings. I made a FOIA request and issued a subpoena for the footage and was informed that in order to be provided with the footage DOC had in their possession, DOC required the attached Protective Order be signed by Your Honor.

I have spoken with the Government and they do not object to the Protective Order and the footage being turned over to defense counsel.

CONCLUSION

Defendant respectfully requests Your Honor sign the attached Protective Order.

CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies, on Monday, March 6, 2023, 2023, the within motion was filed via the Court's electronic filing service.

Dated: March 6, 2023

Respectfully Submitted,

s/Alex Cirocco

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