

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES

v.

MATTHEW RYAN MILLER,

*Defendant.*

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Crim. No. 21-CR-0075(RDM)

**SUPPLEMENT TO DEFENDANT’S AMENDED MOTION FOR  
MODIFICATION OF PRETRIAL DETENTION ORDER AND  
MEMORANDUM OF POINTS AND AUTHORITIES**

Defendant Matthew Ryan Miller (“Miller”), by and through undersigned counsel, hereby submits the attached Supplement to his Amended Motion for Modification of Pretrial Detention Order and respectfully moves this Honorable Court to consider the Supplement when ruling upon his Motion.

**Dated:** Washington, DC  
February 14, 2021

**BALAREZO LAW**

/s/

By:

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A. Eduardo Balarezo, Esq.  
D.C. Bar # 462659  
400 Seventh Street, NW  
Suite 306  
Washington, DC 20004  
Tel. 202-639-0999  
Fax. 202-639-0899

*Counsel for Defendant Matthew Miller*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14<sup>th</sup> day of February 2021, I caused a true and correct copy of the foregoing Supplement to Defendant's Amended Motion for Modification of Pre-Trial Detention Order and Memorandum of Points and Authorities in Support Thereof to be delivered to the parties in this matter via Electronic Case Filing (ECF).

/s/

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A. Eduardo Balarezo



*Glenelg Construction, Inc. \* Electrical Contractor \* National Electrical Contractors Association*

Feb 11, 2021

To: The Honorable Randolph Moss  
Reference - Matthew Miller

Dear Judge Moss,

I am writing in support of Matthew Miller. After reading the complaint, I am aware of the serious nature of the charges, and I empathize with the victims of the events leading to Matt's incarceration. I particularly abhor violence against police officers and the disgraceful desecration of our public institutions and buildings.

As President of Glenelg Construction, I have known Matt since childhood and employed him for the last two years. Matt has been an exemplary employee, showing character and ambition to do well and take the steps required to improve himself. He has been responsive and loyal to the needs of the company. A very cheerful and positive person, Matt is a breath of fresh air. He is highly extroverted, conscientious and engaging. The tragedy of his current circumstance is only exceeded by the events of Jan 6<sup>th</sup>.

With great respect for the duties Your Honor, and officers of the court, have graciously assumed in service of our country, including the administration of justice in the matters at hand, I pray that any discretion available in consideration of his prior exemplary record and personal conduct, be afforded to Matthew when appropriate.

Thank you,

A handwritten signature in blue ink, appearing to read "Michael R. Harris", with a long horizontal stroke extending to the right.

Michael R. Harris  
President Glenelg Construction, Inc.

*Glenelg Construction, Inc. \* 7410 Coca Cola Dr. \* Suite 211 \* Hanover, Maryland \* 21076*

*Phone 301.703.4397 Fax 301.829.3698*



*Glenelg Construction Inc. \* Electrical Contractor \* National Electrical Contractors Association*

February 11<sup>th</sup>, 2021

Michael Harris Jr  
Glenelg Construction, Inc.  
7410 Coca Cola Dr, Suite 211  
Hanover, MD, 21076

To: The Honorable Randolph Moss

Re: Matthew Miller – Letter of Support

To Judge Moss,

I am a Vice President with Glenelg Construction Inc. where Matthew Miller was employed from March 2019 until January 2021.

Matt always contributed to a positive work environment. He brought an optimistic attitude to difficult situations, encouraged and empathized with stressed-out employees, was selfless with his time and his money, and was always offering to help. Matt was conscientious and diligent in performing his duties. I could rely on Matt to be on-time, to complete projects correctly, and to tell the truth.

We do work at night at BWI Airport and there have been times I needed help at the last minute. While most people won't arrive without getting notice, Matt always jumped at the opportunity to assist the company and get us through hard times. He has worked day and night consecutively without complaint. He will write a computer memo in the morning, then dig a trench in 100 degree heat in the afternoon. Matt's priorities were aligned with those of Glenelg Construction.

Although Glenelg terminated his employment due to the January 6<sup>th</sup> events, I feel Matt has immense potential for future success at Work and in the Community. For that reason, it was heartbreaking to hear of his current situation. The allegations and the media depictions of Matt completely contradict all my experiences with him. He is kind-hearted and respectful of authority.

I hope this letter of support will assist with any possible leniency during judgement.

Thankyou for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Harris Jr", is written over a light blue circular stamp.

Michael Harris Jr  
Vice President  
Glenelg Construction, Inc.

Tim Hammond  
401 E A St  
Brunswick, MD 21716

February 11<sup>th</sup>, 2021

To: The Honorable Randolph Moss,

I have known Mr. Matthew Miller in a professional capacity for the last couple of years as a co-worker of mine. I was surprised when I recently learned of the case against Mr. Miller. I have always known him to be a good-natured, hardworking member of society, always willing to put others needs before his. It is for this reason I am happy to write a character letter of reference for him. I understand the seriousness of the case, but I would ask and hope the court show leniency.

In our time as co-workers, Mr. Miller was nothing short of reliable and dependable, willing to take on any task. He was a valuable member of the team and his absence has definitely been felt in the past few weeks. His cheerful, upbeat nature was always a boost around the office. He would go out of his way to make someone else's day better. I do not believe Mr. Miller intended anyone or anything any harm, as I have never known him to exhibit behavior of that nature. He is a loyal, honest, devoted person. As a veteran of the armed services, I can honestly say I would be honored to serve beside someone like Mr. Miller. This isolated incident does not in any way exemplify the person I have known.

I sincerely ask the court to take this letter into consideration at sentencing. Despite the poor choices Mr. Miller has made, he still carries the potential to be an honorable and valuable member of any community. I believe he is deeply regretful and ask that the court give him the opportunity to prove so, allowing him to pay his debt as a productive member of society.

Sincerely,

*Tim Hammond*

Tim Hammond

February 12, 2021

To: Honorable Randolph Moss  
Re: Matthew Miller

Judge Moss,

I met Matt upon starting with my current employer at the end of 2019. In that time I have come to know him as a hardworking and loyal person. He was very welcoming and gracious at my inception and was always willing to lend a hand or take the time to explain aspects of the business. His work ethic is strong, and many times I would see his car still parked in our lot as I was leaving – if a job needed to get done, he stayed until it was finished. When someone needed help at a worksite, he would inevitably be the first to arrive.

Matt was always good natured, constantly making everyone feel included and a part of the whole. Delivery drivers, service technicians, sales representatives – they all became family when Matt was involved. He generated goodwill and boosted morale wherever he went and with whomever he interacted. He also spoke of his mother and grandmother a great deal, and through these conversations I learned of his level of commitment to family.

I do believe Matt to be a genuinely good person. His outgoing personality and warm disposition are the building blocks with which he creates his connections with others. I always felt that he was ready to help if I ever needed it, and that he would do so without question.

I appreciate your time and thank you for your consideration.

Regards,

A handwritten signature in blue ink that reads "Joseph Doyle". The signature is written in a cursive style with a large, stylized "D" at the end.

Joseph Doyle

February 14, 2021

Re: Matthew Ryan Miller

To The Honorable Judge Randolph Moss

Dear Sir,

I am writing to you in regard to my nephew Matthew Ryan Miller.

Matty, is a good kid who comes from a good family. We have always believed in hard work and helping others.

I spend time with Matt several times a year at our family Christmas Dinner, Fourth of July Party, our Eastern Shore crab feast and our rock fishing trips, all of which Matt's uncle and i host each year.

Sir, my nephew Matt is really a good person who is smart, generous, giving, hardworking, a good friend to others and a wonderful and caring nephew to his Aunt Janie and Uncle "Pie".

Thank you for the opportunity to share my thoughts with you about my nephew Matt.

Sincerely,

Jane M. Piekarski  
201 Thomas Road  
Centreville, Md 21617