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March 29, 2023



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**LISA EVANS LEWIS**  
CHIEF FEDERAL DEFENDER

March 22, 2023

The Honorable Carl J. Nichols  
United States District Court for the District of Columbia  
E. Barrett Prettyman U.S. Courthouse  
333 Constitution Avenue, NW  
Washington, DC 20001

**RE: United States v. Michael Steven Perkins**  
**Criminal Number 21-CR-447-CJN-4**

Dear Judge Nichols:

On March 15, 2023, after announcing Your Honor's verdict in the above-captioned case, the government and defense counsel were ordered to submit pleadings outlining our respective positions regarding whether Mr. Perkins' conviction under 18 U.S.C. § 111(b) requires remand under 18 U.S.C. § 3143(a)(2). I thank you for the opportunity to research this issue, however, the research did not yield anything which would support the Court having discretion under this statute.

After discussing this issue with the government, the parties have reached a proposed agreement regarding Mr. Perkins' detention pending sentencing. Upon consideration of Mr. Perkins' perfect compliance with pretrial release, the government does not object to allowing Mr. Perkins to self-surrender in thirty (30) days. Mr. Perkins makes this request to allow him the opportunity to arrange his affairs and make provision for his family before his incarceration. Additionally, should the Court grant this request, it will allow the presentence interview to be conducted via a video call, which may not be possible once Mr. Perkins is incarcerated.

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Again, I thank the Court for the opportunity to research this issue. All parties are available to discuss their joint-position with Your Honor via a conference call or video hearing.

Respectfully,

A handwritten signature in black ink, appearing to read "Nancy MacEoin". The signature is fluid and cursive, with a long horizontal stroke at the end.

NANCY MacEOIN  
Assistant Federal Defender

NM/cc

cc: Benet J. Kearney, Assistant United States Attorney