

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

**UNITED STATES OF AMERICA** : **MAGISTRATE NO. 21-MJ-167 (GMH)**  
 :  
 v. :  
 :  
 **TROY FAULKNER,** :  
 **Defendant.** :

**SUPPLEMENTAL INFORMATION IN SUPPORT  
OF MOTION FOR EMERGENCY STAY AND  
FOR REVIEW OF RELEASE ORDER**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits additional information in support of its motion to stay defendant Troy Faulkner's release pending trial, and second, review the decision by the Magistrate Judge from the Southern District of Ohio to deny the government's motion for pre-trial detention. In support thereof, the government states the following:

**SUPPLEMENTAL INFORMATION**

Undersigned counsel for the government and the assigned FBI case agent have reviewed all relevant videos and photos in this matter to determine if the defendant entered the U.S. Capitol or committed additional destructive or violent acts while at the U.S. Capitol on January 6, 2021, although this case like others will be continually reviewed and updated accordingly, at this time the government does not have information that defendant Faulkner entered the building or committed additional illegal acts or that anyone entered that particular window after the defendant broke it. However, to be clear, the government and FBI are reviewing additional information on a daily basis and if new information becomes relevant to this case, undersigned counsel for the government will notify the Court and parties without delay.

Nevertheless, the government respectfully avers that the defendant should be detained pending trial because of his violent and destructive acts by kicking in and breaking a window at the U.S. Capitol on January 6, 2021. For the Court's review, undersigned counsel for the government has included the report of repairs for the window that defendant broke which was prepared by the Architect of the Capitol. Specifically, the cost of repairs are noted to be in excess of \$10,000. *See*, Attachment 1 - Architect of the U.S. Capitol Report. Moreover, the defendant's criminal record coupled with the facts of this case supports the defendant's detention in this matter. Defendant's complete criminal history as prepared by PreTrial Services in Ohio is included for the Court's review. Of note, the defendant has numerous convictions – one for carrying a concealed weapon (2012), aggravated menacing/assault (2011) and several for domestic violence type convictions (2008 & 2009) - which are concerning to the government and supports the defendant detention in this matter. *See*, Attachment 2 - Pre-Trial Services Report from Ohio.

Respectfully submitted,

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/s/Emory V. Cole

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