

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

UNITED STATES OF AMERICA :
 :
 v. : **Criminal No. 21-CR-35 (EGS)**
 :
JEFFREY SABOL, :
 :
 Defendants. :

**NOTICE OF GOVERNMENT’S OPPOSITION TO DEFENDANT’S MOTION FOR
BOND RECONSIDERATION / RE-OPENING**

The United States of America respectfully provides notice of its opposition to Defendant Jeffrey Sabol’s August 23, 2021 Motion for Bond Reconsideration / Re-Opening.

The defendant is currently detained because this Court found (1) by clear and convincing evidence, that no condition or combination of conditions will reasonably assure the safety of any other person and the community were the defendant to be released pending trial; *and* (2) by a preponderance of the evidence, that no condition or combination of conditions will reasonably assure the defendant’s appearance as required if he were to be released pending trial. *See* Memorandum Opinion as to Jeffrey P. Sabol, ECF No. 56. Since the Court issued its April 14, 2021 Memorandum Opinion, the Government has identified at least two additional assaults against law enforcement officers that the defendant committed on January 6, 2021, along with additional conduct that interfered with law enforcement on January 6, 2021. Because of this conduct and other evidence developed during the course of this investigation, on August 4, 2021, the defendant was indicted on five additional felony charges in a superseding indictment. *See* Second Superseding Indictment, ECF No. 92. Accordingly, the government opposes the defendant’s pretrial release because the defendant remains a danger to the community and a flight risk.

As directed in the Court's September 9, 2021 Minute Order, the United States will file its memorandum of points and authorities in opposition, along with its additional exhibits, no later than September 17, 2021.

Respectfully submitted,

CHANNING PHILLIPS
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CERTIFICATE OF SERVICE

I certify that a copy of the Government's Motion for Pretrial Detention was served on all counsel of record via the Court's electronic filing service.

/s/ Colleen D. Kukowski
COLLEEN D. KUKOWSKI
Assistant United States Attorney

Date: September 10, 2021