

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

v. : Criminal No. 21-MJ-489(RMM)

JOSHUA DILLON HAYNES :

Defendant :

MOTION TO REVOKE BOND

Comes Now defendant, JOSHUA DILLON HAYNES, by and through counsel who that this Honorable Court revoke the bond in this case. As grounds, defendant submits the following information:

1. The defendant is before this Court charged with alleged offenses stemming from the January 6, 2021 incident at the U.S. Capitol.
2. When presented before this Court he was released on bond with the specific condition oh house arrest. He was subsequently arrested in Allegheny County, Virginia and charges with domestic violence charges. He is being held without bond. The government filed a motion to revoke his bond which the court deemed moot because the court issued a warrant for his arrest based on the Pretrial Services report.
3. Counsel requests that in addition to the arrest warrant issued, that the Court revoke his bond so that in the event of conviction, he will receive credit for time served.

WHEREFORE, the foregoing premised considered, defendant requests that this motion be granted.

Respectfully submitted,

_____/_____
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