

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Criminal No. 21-cr-00037 (TNM)

TIMOTHY HALE-CUSANELLI,

Defendant.

SUPPLEMENTAL EXHIBIT TO DEFENDANT'S MOTION

Defendant Timothy Hale-Cusanelli, through counsel, hereby submits the attached letter by John Getz in support of his previously filed Motion for Modification of Bond to Place the Defendant on Conditional Release Pending Trial. [Document 13]

Respectfully submitted,

/s/

Jonathan Zucker #384629

37 Florida Avenue, NE,

Suite 200

Washington, DC 20002

(202) 624-0784

jonathanzuckerlaw@gmail.com

Counsel for Timothy Hale-Cusanelli

CERTIFICATE OF SERVICE

I certify that on March 7, 2021, the foregoing was electronically filed with the court using the CM/ECF system that will serve the following registered user: James Nelson at james.nelson@usdoj.gov.

/s/

Jonathan Zucker

To Whom it May Concern,

Sir or Ma'am, I am writing to you today regarding Timothy Hale-Cusanelli. I have known Mr. Hale for a little over two years. In that time, I served as his supervisor at Naval Weapon Station Earle for the past year and a half. I was appalled at how he was slandered in the press in regards to him being a "white supremacist". I have never known him to be this way. I know that our co-workers would agree. For example, he was close with an African-American co-worker for whom he would frequently buy breakfast. Never have I seen Mr. Hale treat any of his African-American co-workers differently than anybody else, nor have I heard any distasteful jokes or language leave his mouth. I believe the media to have severely exaggerated this particular character trait.

During his time at Naval Weapon Station Earle, Mr. Hale volunteered his services as the union representative. To be perfectly honest, our Union was a complete failure prior to Mr. Hale taking over. Our previous representatives only cared about issues that affected them. Mr. Hale had a very different approach. Even though I feel as though Mr. Hale was being mistreated by our bosses, he took care of everybody else's problems before his own. That's the kind of person that I saw every day at work. The type of person that took care of everybody else before he took care of himself.

After this incident, I've read and heard a lot about Mr. Hale being a violent person. That couldn't be further from the truth. I've never even heard him raise his voice in anger. I've witnessed incidents between Mr. Hale and other co-workers that would make anybody angry. The way that Mr. Hale handled these situations greatly impressed me. He would simply take the co-worker off to the side and talk to them, employee-to-employee. The situation would typically

be resolved after that, and I wouldn't even have to get involved. I would think that somebody with violent tendencies and no self-control would have at least raised his/her voice.

In conclusion, I am proud to have Mr. Hale on my shift. I couldn't have asked for a kinder individual who would take the time while he was off from work and go to Wawa to buy coffee and food with his own money to ensure that the midnight shift was taken care of. As a Sergeant First Class and a Platoon Sergeant in the United States Army, I would be proud to have someone like Mr. Hale serve under me in any of my units. Thank you, sir or ma'am, for taking the time to read this letter.

Sincerely,

John Getz