

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-CR-175-2

JOSEPH RANDALL BIGGS,

Judge Timothy J. Kelly

Defendant.

**BIGGS' SECOND AND FINAL SUPPLEMENT TO MOTION TO  
REOPEN HEARING AND FOR RELEASE FROM DETENTION**

Defendant Joseph Randall Biggs (“Biggs”), by undersigned counsel, files this second and final Supplement to his Motion to Reopen (ECF No. 137) under 18 U.S.C. Section 3142 (f):

**Feasible Additional Home Release Restrictions**

Between January 20 and April 22, and without objection until March 20, defendant Biggs served a strict-conditions home detention release. Biggs here repeats and underscores past suggestions of defense counsel that a future home detention release could additionally minimize the risk of any perceived forward-looking public dangerousness if the release were combined with regimes of (1) 24-hour real time video monitoring at his Florida residence, (2) a requirement of no public internet-capable devices at the residence and (3) a “walling off” of the residence from public internet or other public portals. These features are feasible, effective, and inexpensive.

Respectfully submitted,

Counsel for Joseph R. Biggs

Dated: September 27, 2021

By: /s/ John Daniel Hull  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on September 27, 2021, he served a true and correct copy of the forgoing Supplement via Electronic Case Filing (ECF) system upon counsel for the government and all counsel of record.

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