

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

UNITED STATES OF AMERICA :
 :
 v. : **CASE NO. 21-CR-003 (RCL)**
 :
JACOB ANTHONY CHANSLEY, :
Defendant. :

**SURREPLY TO DEFENDANT’S EMERGENCY
MOTION FOR PRE-TRIAL RELEASE**

The government now submits as a part of the record in this case two video exhibits—Exhibit 1 and Exhibit 2—which will be provided to the Court and defense counsel via the USAfx system. The Exhibits were referenced in today’s oral argument on the defendant’s motion for pre-trial release. The government also referenced a media interview given by the defendant. That interview was a part of the program 60 Minutes+, which aired on March 4, 2021, and can be found at the following hyperlink: <https://www.youtube.com/watch?v=osb7X6tAwpc>.

An analysis of the factors under 18 U.S.C. § 3142(g) demonstrates that the Defendant should remain detained pending trial. As a result, the government respectfully opposes the defendant’s motion for pre-trial release.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES
ATTORNEY

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing opposition to the motion for release has been served upon defense counsel, Al Watkins, by email and ECF/PACER notification, on this day, March 5, 2021.

_____/s/_____
KIMBERLY L. PASCHALL
Assistant United States Attorney