

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	CRIMINAL CASE NO.
	)	1:21-CR-00346-BAH-1
GLEN MITCHELL SIMON	)	

DEFENDANT'S RESPONSE TO THE COURT'S ORDER REGARDING  
PUBLICLY RELEASING VIDEO EVIDENCE

COMES NOW the Defendant, GLEN MITCHELL SIMON, by and through undersigned counsel and files this status report as directed by the Court. On Sunday, August 16, 2021, the Court ordered the parties to inform the Court of their positions regarding whether the video evidence described in the proposed Statement of Offense in support of Mr. Simon's proffered guilty plea may be made publicly available without restriction.

As described in the government's status report, (Doc. 24), the three videos summarized in the Statement of Offense are Mr. Simon's personal videos, obtained by the government through execution of a search warrant on Mr. Simon's cell phone. Mr. Simon has not contested the search warrant or its execution, and has indicated to the Court his willingness to admit his conduct and resolve his case by entering a plea of guilty. However, he opposes the public release of his private videos. Mr. Simon did not consent to the search of his personal cell phone, nor to the public distribution of his private videos. Publicly releasing his personal videos would

violate Mr. Simon's privacy, and is not required when he has indicated that he will admit to the detailed statement of the offense, and his guilt, pursuant to a written plea agreement.

Dated: This 16th day of August, 2021.

Respectfully Submitted,

/s/ Rebecca Shepard

Rebecca Shepard

Georgia Bar No. 780692

Attorney for Glen Simon

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Defendant's Response To The Court's Order Regarding Publicly Releasing Video Evidence has been formatted in Times New Roman 14 pt., in accordance with Local Rule 5.1B, and was electronically filed this day with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following counsel of record:

Amy Larson, Esq.  
Laura Hill, Esq.  
Assistant United States Attorney  
555 4th Street, NW  
Washington, DC 20530

Dated: This 16th day of August, 2021.

/s/ Rebecca Shepard  
Rebecca Shepard  
Georgia Bar No. 780692  
Attorney for Glen Simon