

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :  
 :  
 v. : Criminal No. 21-CR-291-2 (ABJ)  
 :  
 ALBUQUERQUE COSPER HEAD, :  
 :  
 Defendant. :

**SUPPLEMENT TO THE GOVERNMENT’S  
MEMORANDUM IN SUPPORT OF PRE-TRIAL DETENTION**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this Supplement to its Memorandum in Support of Pre-trial Detention, which was filed on April 28, 2021 (ECF No. 32).

As an initial matter, the government supplements the following quote to include the case citation from *United States v. Jeffrey Sabol*, in which Judge Emmett G. Sullivan found that “grave concerns” were “implicated by Mr. Sabol’s conduct, which included using physical force to strip Officer A.W. of his police baton, assisting other rioters in pulling officer B.M. into the mob, assaulting Officer B.M. with the baton he had stolen from Officer A.W.” which set “him apart from other rioters who engaged with law enforcement but have been granted pretrial release.” *United States v. Jeffrey Sabol*, 21-cr-35 (EGS), (ECF No. 56) at 36.

The government further notes that while the cases of *United States v. Clayton Ray Mullins*, 21-cr-35-2 (EGS), (ECF No. 50-2) and *United States v. Michael John Lopatic*, 21-cr-35-3 (EGS), (Minute Order, April 26, 2021) are both factually similar to the instant case and similar in that the government is not seeking detention under Section 3142(f)(1), however, for the reasons set forth in Government’s Memorandum in Support of Pre-trial Detention (ECF No. 32), this case is distinguishable. There is significant evidence that there is a serious risk the defendant will flee or

obstruct justice as the defendant was on probation in the state of Tennessee in Case No. 40844 and did not have permission to travel outside of the state of Tennessee at the time of the instant offense, which occurred in the District of Columbia.

WHEREFORE, the United States respectfully requests that this filing supplement the Government's Memorandum in Support of Pre-trial Detention (ECF No. 32).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 30, 2021, I served a copy of this pleading on defendant's counsel through the Court's electronic filing system.

/s/ Tara Ravindra

Tara Ravindra  
Assistant United States Attorney