

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

United States

v.

CASE NO: 1:21-mj-00034-CRC

Thomas Robertson

**DEFENSE SUPPLEMENTAL BRIEF IN SUPPORT OF ITS OPPOSITION
MOTION TO REVOKE RELEASE ORDER**

The Defense submits this supplemental brief to respond to the Government's supplemental brief. The M228 Fuzes shown identified in their motion is a practice grenade fuze. It is used to simulate a grenade. Furthermore, this was used as a training device but is not a real grenade. There is a hole at the bottom and the top. Under information and belief, the light blue color and the whole at the bottom let the person know it is not real¹.

The Defense also submits the affidavit of Hunter Robertson (*See attached*) regarding the possession of the M4 rifle recovered from his home.

Finally, Mr. Robertson is amenable to house arrest or GPS monitoring. He has never missed a check in appointment with his pretrial services officer and followed all the rules of his pretrial services officer. He turned himself when his pretrial services officer requested him to do so.

¹ <https://www.youtube.com/watch?v=ujv1DcZD40I>

Respectfully submitted
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CASE NO: 1:21-mj-00036-RMM-1

Thomas Robertson

AFFIDAVIT OF HUNTER ROBERTSON

I, Hunter Robertson, attest and state the following occurred on June 29, 2021. On or about June 28, 2021, I had arrived at my father's house. My father informed me that he would be gone away from the property on June 29, 2021. I took my AR-15 gun into his house and put it on his bed because I was retrieving ammunition from his safe, which is in his bedroom. The gun recovered from my father's house was my gun. (Identified below)



I also state that I am a licensed gun owner and have a permit to carry this weapon.

I HEREBY SWEAR AND AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE ABOVE STATEMENT IS TRUE AND CORRECT

Hunter Robertson

07 / 14 / 2021

Hunter Robertson

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