

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

UNITED STATES OF AMERICA :
 :
 v. : **No. 21-CR-327**
 :
LUKE RUSSELL COFFEE, :
Defendant. :

**GOVERNMENT’S OPPOSITION TO MOTION TO
MODIFY CONDITIONS OF PRETRIAL RELEASE**

Luke Coffee used a crutch to attack law enforcement officers as they guarded a Lower West Terrace entrance to the U.S. Capitol during the insurrection on January 6, 2021. Coffee’s assault, captured on video, included charging at these United States Capitol Police and Metropolitan Police Department Officers using the crutch and, in at least one instance, using the crutch in an attempt to strike the upper chest/head area of one of the officers. He did so as a member of the mob attacking the Capitol during its constitutional responsibility of confirming the results of the 2020 Presidential Election. This gravely serious conduct constituted an act of domestic terrorism, *see* 18 U.S.C. § 2331(5), and resulted in a grand jury charging Coffee with seven different felonies, including a crime of violence with a dangerous weapon. This Court should not now relax the defendant’s conditions of release.

For the reason’s stated in the Government’s Memorandum in Support of Pretrial Detention, ECF No. 10, the defendant is a danger to the community and poses a serious risk of flight. His apparent compliance with his conditions of release for four months does not negate the danger he poses; if anything, it reflects that stringent conditions of release have been successful in assuring the defendant’s appearance and the safety of the community. The defense points to nothing in its request for a relaxing of the defendant’s conditions of release other than

four months of purported compliance with release conditions. The defense claims no interference from the GPS and home confinement requirements with the defendant's employment, educational pursuits or anything else. It seems he merely, and entirely understandably, would prefer fewer restrictions on his freedom of movement while he awaits trial on the ten-count Indictment. At this juncture in the prosecution of the defendant, this Court should not reduce its oversight of the defendant by eliminating these important conditions of his pretrial release.

Respectfully submitted,

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