

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

**UNITED STATES OF AMERICA**

**v.**

**SHANE JASON WOODS,**

**Defendant.**

**21-cr-476 (APM)**

**GOVERNMENT’S MOTION TO REVOKE DEFENDANT WOODS’  
RELEASE PENDING SENTENCING**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, hereby moves this Court pursuant to 18 U.S.C. § 3143(a) to issue a warrant for the arrest of defendant Shane Jason Woods (hereinafter, “Defendant Woods”) for violations of his release pending sentencing, to revoke his pre-trial release order, and detain him pending execution of his sentence. On November 8, 2022, the Defendant Woods was arrested on state charges for negligent homicide. Based on this new criminal conduct, Defendant Woods poses a danger to the safety of others and his release should be revoked.

**I. BACKGROUND**

On June 21, 2021, a magistrate judge in the District of Columbia issued an arrest warrant for Defendant Woods for multiple violations, including 18 U.S.C. §§ 111(a)(1), 113(a)(4), 231(a)(3), 1752(a)(1), (2), and (4), and 40 U.S.C. § 5104(e)(2)(D) and (F). Defendant Woods was arrested on June 24, 2021, in the Central District of Illinois. On July 6, 2021, a magistrate judge in the District of Columbia issued an order releasing Defendant Woods subject to certain conditions, consistent with 18 U.S.C. § 3142, including that he not violate any federal, state, or local law while on release. *See* ECF 8 at 1.

On July 16, 2021, the grand jury returned an eight-count indictment charging Defendant Woods with 18 U.S.C. §§ 111(a)(1), 113(a)(4) and (5), 231(a)(3), 1752(a)(1), (2), and (4), and 40 U.S.C. § 5104(e)(2)(F). *See* ECF 9. On October 29, 2021, the grand jury returned a superseding indictment that updated the charging language of certain counts but made no other substantive changes. *See* ECF 19. On September 9, 2022, Defendant Woods pleaded guilty to Counts Two and Three of the superseding indictment. *See* ECF 37. As part of his plea agreement, the government agreed to not seek a change in his release conditions. *See* Exhibit 1 at ¶ 9. However, Defendant Woods and the government agreed that “The Government may move to change [Defendant Woods’] conditions of release, including requesting that your client be detained pending sentencing, if your client engages in further criminal conduct prior to sentencing . . . .” *See id.*

On November 8, 2022, Defendant Woods was arrested at the Memorial Medical Center in Springfield, Illinois, on charges of Reckless Homicide (felony), Aggravated Driving Under the Influence Causing Death (felony), Driving Under the Influence (misdemeanor), and Aggravated Fleeing and Eluding (felony). *See* Exhibit 2. He has been in custody on the state charges since November 8, 2022, in Sangamon County, Illinois, subject to a \$2,000,000 bond. On November 16, 2022, the Sangamon County grand jury indicted Defendant Woods for First Degree Murder (felony), Aggravated Driving Under the Influence of Alcohol (felony), and Aggravated Fleeing and Eluding a Peace Officer (felony). The government has obtained the police reports underlying Defendant Woods’ arrest for these state charges. *See* Exhibit 2. These reports state that on November 8, 2022, Defendant Woods was stopped in his vehicle by law enforcement. During the stop, the officer detected the odor of an alcoholic beverage on Defendant Woods’ breath and Defendant Woods then fled the officer in his vehicle. Defendant Woods traveled the wrong way

on the interstate before striking three vehicles, causing the death of the driver of one vehicle and great bodily harm to two others in a third vehicle. Defendant Woods was transported to the hospital and hospital staff advised that Woods had a .177 blood alcohol concentration, almost double the legal limit in Illinois. While at the hospital, the police officer overheard Defendant Woods state to a family member that he intended to crash his vehicle into a semi-trailer. *See* Exhibit 2.

## **II. ARGUMENT**

Defendant Woods' post-plea conduct demonstrates he is a danger to the community and this Court should revoke his release. Under 18 U.S.C. § 3143(a), a person who has been found guilty of an offense and who is awaiting execution of a sentence shall be detained "unless the judicial officer finds by clear and convincing evidence that the person is not likely to flee or pose a danger to the safety of any other person or the community if released under section 3142(b) or (c)." Defendant Woods has pled guilty to committing two acts of violence and he is no longer presumed innocent. His actions on November 8, 2022, are abhorrent, violent, and demonstrate he is a danger to the community. Additionally, Defendant Woods has violated the terms of this release by committing three felonies, including First Degree Murder. *See* ECF 8 at 1.

### III. CONCLUSION

Wherefore, the government respectfully requests that this Court issue an arrest warrant for Defendant Woods pursuant to 18 U.S.C. § 3143(a), for violating his release, revoke his pre-trial release order, and detain him pending sentencing in this matter.

Respectfully submitted,

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Dated: November 16, 2022

Exhibits:

1. Plea agreement between Defendant Woods and government, dtd September 8, 2022.
2. Sangamon County Sheriff's Office Field Booking and Probable Cause Statement, dtd November 8, 2022.

CERTIFICATE OF SERVICE

On this 16th day of November, 2022, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

/s/ Brian Brady  
Brian Brady  
Trial Attorney