

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Criminal No. 21-CR-00223
 :
 MATTHEW MARK WOOD, :
 Defendant. :

DEFENDANT’S REPLY TO GOVERNMENT’S RESPONSE TO
DEFENDANT’S MOTION TO SUPPRESS STATEMENTS AND EVIDENCE

COMES NOW Kira Anne West, counsel for Mr. Matt Wood in the above captioned case, and files this reply in the above case and in support states the following:

The defendant does not disagree with part of the government’s response nor did the defendant ask that his statements that were given voluntarily be suppressed. Specifically, the defendant, on his own, contacted the FBI and turned himself in.¹ This statement and other voluntary statements may not subject to suppression. However, at the very least, once the defendant was formally arrested, his statements

¹ Undersigned counsel received from the government the defendant’s recorded statement for the first time May 16, 2022 at 4 pm.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA:: v.: Criminal No. 21-CR-00223: MATTHEW MARK WOOD,: Defendant.: DEFENDANT'S REPLY TO GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION TO SUPPRESS STATEMENTS AND EVIDENCE COMES NOW Kira Anne West, counsel for Mr. Matt Wood in the above captioned case, and files this reply in the above case and in support states the following: The defendant does not disagree with part of the government's response nor did the defendant ask that his statements that were given voluntarily be suppressed. Specifically, the defendant, on his own, contacted the FBI and turned himself in.¹ This statement and other voluntary statements may not be subject to suppression. However, at the very least, once the defendant was formally arrested, his statements¹ Undersigned counsel received from the government the defendant's recorded statement for the first time May 16, 2022 at 4 pm. ¹ should be suppressed. So also should the evidence from his phone be suppressed as a result of this police custody and involuntary consent. He was essentially under arrest at the time he signed the consent and was not given a Miranda warning. The defendant should be given an opportunity to make a record of how those statements were given and under what circumstances. Unfortunately, defendant received on May 9, 2022, for the first time, the celebrite report on the defendant's phone. Moreover, although the defendant requested, in writing, the warrant for the defendant's phone on April 26, 2022, undersigned counsel still has not received it from the government but hopes to have it by May 19, 2022. When undersigned counsel can review this evidence, she will supplement her original motion to suppress and this reply. The defense is very concerned with the late disclosure of evidence in this case and has discussed same with the government. WHEREFORE, Defendant prays this Honorable Court will defer ruling on the motion to suppress until such time as defense counsel can review the entirety of the discovery. ² Respectfully Submitted, /s/ Kira Anne West, Esq. DC Bar No. 993523 712 H. Street N.E., Unit 509 Washington, D.C. 20002 (202)-236-underr@analyst@gmail.com by for Mr. Matthew Wood Certificate of Service I certify that a copy of the forgoing was filed electronically for all parties of record on this 18th day of May, 2022. ___/s/_____ Kira Anne West, Esq. Attorney for Mr. Matthew Wood ³

Unfortunately, defendant received on May 9, 2022, for the first time, the celebrite report on the defendant's phone. Moreover, although the defendant requested, in writing, the warrant for the defendant's phone on April 26, 2022, undersigned counsel still has not received it from the government but hopes to have it by May 19, 2022. When undersigned counsel can review this evidence, she will supplement her original motion to suppress and this reply. The defense is very concerned with the late disclosure of evidence in this case and has discussed same with the government.

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