

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

**UNITED STATES OF AMERICA** :  
 :  
 v. : **Case No. 21-cr-155 (ABJ)**  
 :  
**JACOB HILES,** :  
 **Defendant.** :

**DEFENDANT’S MOTION FOR EARLY TERMINATION OF PROBATION**

Defendant, Jacob Gavin Hiles, by and through his undersigned counsel, seeks an Order terminating his probation, and states as follows:

1. On January 19, 2021, Mr. Hiles voluntarily surrendered to the Federal Bureau of Investigation (“FBI”) on an Arrest Warrant relating to misdemeanor offenses and was processed at the United States District Court for the Eastern District of Virginia, where he was shackled. An initial presentment was held that day and Mr. Hiles was released on his personal recognizance, where the assigned judge refused to grant all of the Government’s requested conditions of release given Mr. Hiles’ complete absence of a criminal history. On January 22, 2021, Mr. Hiles appeared before Magistrate Judge Robin M. Meriweather by video, where he was again permitted to remain on his personal recognizance.

2. On September 9, 2022, Mr. Hiles entered a guilty plea to one count of Parading, Demonstrating, or Picketing in a Capitol Building, a petit misdemeanor offense, in violation of 40 U.S.C § 5104(e)(2)(G), which carries a maximum period of incarceration of six months. At the conclusion of that proceeding, Mr. Hiles was permitted to remain on his personal recognizance.

3. As discussed at his sentencing, while inside the U.S. Capitol, Mr. Hiles did not break, damage, or steal any property; hurt, injure, accost, or threaten law enforcement (or anyone else); go into any private office space or proceed to the well of the House or the Senate. Mr. Hiles

was not involved in planning or leading any of the activities that the crowd was engaged in on January 6, 2021, nor was he associated with any of the groups reported to be responsible for aspects of what occurred that day.

4. At 43 years of age, prior to his misdemeanor conviction in this case, Mr. Hiles has been convicted of several traffic infractions and one DUI in 2004, has been in full compliance with his conditions of bond and his conditions of probation. Prior to being arrested, and since his arrest, Mr. Hiles fully cooperated with law enforcement at all stages of its investigation, including, but not limited to: (i) giving a lengthy interview with FBI agents and full statements accounting to his presence inside the U.S. Capitol; and (ii) providing his cellphone that was with him on January 6, 2021.

5. On December 6, 2021, this Court sentenced Mr. Hiles to twenty-four (24) months of probation, pay a special assessment of \$10.00, and restitution in the amount of \$500.00. During the sentencing hearing, the Court advised Mr. Hiles that if he abided by the terms of probation and paid his special assessment and restitution, the Court would entertain a motion for early termination of probation.

6. Mr. Hiles reports that on December 7, 2021, the day after he was sentenced, Mr. Hiles paid his special assessment and restitution.

7. In addition, at Mr. Hiles' sentencing hearing, Assistant United States Attorney Mary Dohrmann stated that Mr. Hiles could not have been more cooperative up to that day.

8. Currently, Mr. Hiles is in full compliance with his supervision requirements as he was during the term of his pretrial release in this matter.

9. It is expected that Mr. Hiles probation office, Daniel Miller will confirm that Mr. Hiles has been in full compliance with the terms of his probation and will not object to his early

release.

10. Accordingly, given the exemplary actions undertaken by Mr. Snow to expeditiously pay full restitution and stay in compliance with the terms of his probation, Mr. Hiles respectfully requests that his probation be terminated.

Dated: January 19, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify on the 19th day of January, 2023 a copy of same was delivered to the parties of record, by email pursuant to the Covid standing order and the rules of the Clerk of Court.

/S/  
Charles Haskell