

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES

v.

QUAGLIN

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Case No. 1:21-cr-40

SECOND SUPPLEMENT TO DEFENDANT'S SECOND MOTION FOR
PRETRIAL RELEASE

Early in the morning on December 23, 2022, two days before Christmas, Mr. Quaglin was transferred from Northern Neck Regional Jail.¹ Mr. Quaglin has been transferred to Rappahannock Regional Jail.

Judge Thomas Hogan of this Court has already ruled in a separate case that Rappahannock Regional Jail is not equipped to provide January 6th detainees with what they require to prepare for trial. *See United States v. Nichols*, Case No. 1:21-cr-117-1. Specifically, Rappahanock, by its own admission, could not provide Mr. Nichols access to a computer to view his discovery, or to the global discovery on evidence.com or relativity.com. Accordingly, Judge Hogan ordered Mr. Nichols released to his home in Longview, Texas, supervised by Mr. Nichols' wife as a third-party custodian, with conditions that allow Mr. Nichols to prepare for trial. *See* Exhibit A, Judge's Hogan's Order.

There is no difference between Mr. Nichols' case and Mr. Quaglin's case. Accordingly, as Mr. Quaglin has been transferred to Rappahannock Regional Jail, and as he will be unable to prepare for trial there, like Mr. Nichols, Mr. Quaglin should also be released to the custody of his wife so that he can prepare for trial.

¹ Mr. Quaglin's attorneys only learned of the transfer after they filed the first supplement to this motion, ECF No. 499.

Dated: December 23, 2022

Respectfully submitted,

/s/ Jonathan Gross

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being served on opposing counsel via email on

December 23, 2022.

/s/ Jonathan Gross