

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 1:21-CR-37</b>
	:	
<b>v.</b>	:	<b>(JUDGE McFADDEN)</b>
	:	
	:	
<b>TIMOTHY LOUIS HALE- CUSANELLI,</b>	:	
<b>Defendant</b>	:	

**REPLY BRIEF IN SUPPORT OF DEFENSE’S MOTION TO TRANSFER  
VENUE**

AND NOW comes the Defense who seeks to transfer venue for trial. Mr. Hale-Cusanelli respectfully requests trial by an impartial jury, pursuant to the Fifth Amendment, the Sixth Amendment, and Rule 21(a) of the Federal Rules of Criminal Procedure. Mr. Hale-Cusanelli requests this change in venue due to the ongoing disruption to the lives of the local residents would deny Mr. Hale-Cusanelli any opportunity for an impartial jury. The Defense rests on its initial brief in support of transferring venue.

Respectfully submitted,  
CRISP AND ASSOCIATES, LLC

Date: 22 April 2022

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served on the individual listed below:

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