UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

V.

Case No. 21 CR 0084 (PLF)

:

CODY PAGE CARTER CONNELL and

DANIEL PAGE ADAMS

:

DEFENSE RESPONSE TO PRETRIAL SERVICES STATUS REPORT

At the request of the Court, counsel for defendant Cody P. Connell submits the following response to the Status Report filed by United States Pretrial Services on June 1, 2023 (ECF No. 82).

The Status Report notified the Court that Mr. Connell was arrested at his home in Bossier City, Louisiana on May 12, 2023. The officer who arrested Mr. Connell listed a charge of 2nd degree battery. Mr. Connell is out of custody and the local prosecutor has not filed charges against Mr. Connell. It is not at all clear that any charges will ultimately be filed once the prosecutor has had an opportunity to review the facts surrounding the arrest. Mr. Connell is scheduled to appear in court on June 20, 2023.

The defense has reviewed a copy of the arrest report. The report indicates that a woman who was in an abusive relationship came to Mr. Connell's home because she is friends with Mr. Connell's fiancée. This woman's husband came to the home looking for his wife and became aggressive. When Mr. Connell and his brother asked the man to leave the home, he struck Mr. Connell's brother. Mr. Connell and his brother then physically removed this man from the home. It therefor seems unlikely that criminal charges against Mr. Connell will be pursued by local authorities. Mr. Connell has been on pretrial release and has been completely compliant with all

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conditions for more than two years. He works full time and lives with his fiancée and daughter in

Louisiana.

In light of these facts, the defense suggests that the Court take no action in response to the

June 1, 2023 Status Report. The information before the Court provides no basis to alter the existing

conditions of Mr. Connell's release.

Dated: June 5, 2023

Respectfully submitted,

/s/

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