

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

_____)	
UNITED STATES,)	
)	
v.)	Crim. No. 21cr40
)	Hon. Trevor McFadden
GEOFFREY SILLS,)	
Defendant.)	
_____)	

MOTION TO ADOPT AND JOIN CO-DEFENDANT MORSS’
MOTION FOR RECONSIDERATION OF PRE TRIAL RELEASE

Comes now Defendant Geoffrey Sills, by counsel, and moves the Court for leave to Adopt and Join the Motion for Reconsideration of Pretrial Release of Co-Defendant Robert Morss (Doc 283) with the exception of Section 1(c) and the Conclusion. In lieu thereof, Defendant Sills states as follows.

Conditions of Confinement

Defendant Sills has not suffered the utterly dehumanizing abuse meted Defendant Morss by the jail staff at CTF. Nonetheless, he has suffered medical travails not alleviated by his jailors and at least one savage beating by a fellow inmate that was ignored by the staff at his place of confinement, the Northern Neck Regional Jail in Warsaw, Virginia. These conditions of Defendant’s detention are clearly unrelated to any “legitimate goal” and are consequently “arbitrary” implying “that the purpose of the governmental action [in seeking his detention] is punishment that may not constitutionally be inflicted upon detainees qua detainees.” *Bell v. Wolfish*, 441 U.S. 520, 539 (1979).

Conclusion

By forcing Defendant to choose between two rights to which he is equally entitled, the government merely reinforces the compelling reasons for his release adduced in earlier pleadings. The Court should also note Defendant's comportment in confinement.

In over 10 months confinement, Defendant has incurred not one disciplinary infraction.

Respectfully submitted,

GEOFFREY SILLS
By Counsel

/s/
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Certificate of Electronic Service

I hereby certify that on May 9, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, with consequent service on all parties.

/s/
John C. Kiyonaga