

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

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|---------------------------------|---|-----------------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | Case No. 21-cr-00077 (RDM) |
| v. | : | |
| | : | |
| MELODY STEELE-SMITH, | : | |
| | : | |
| Defendant. | : | |

**GOVERNMENT’S REPLY TO DEFENDANT’S
RESPONSE TO PRE-SENTENCE REPORT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this reply to Defendant Melody Steele-Smith’s Response to Pre-Sentence Report. ECF No. 56. Steele-Smith listed four paragraphs of the Pre-Sentence Report (ECF No. 55) that require either corrections, clarifications, or additions: Paragraphs 20, 22, 50, and 63. The government takes no position as it relates to paragraphs 50 and 63.

As it relates to Paragraph 20, the government agrees that the Pre-Sentence Report should be corrected to state that Steele-Smith did not climb a wall to reach the Capitol. The government has confirmed that Steele-Smith stepped over a short wall to reach the Capitol. Her approach did not include the scaling of a wall or the climbing of a wall to reach the Capitol.

As it relates to Paragraph 22, the government agrees that the Pre-Sentence Report should be corrected to reflect that Steele-Smith was outside of the Capitol when she was struck by a rubber bullet.

Respectfully submitted,

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CERTIFICATE OF SERVICE

On this 7th day of June, a copy of the foregoing was served upon all parties listed on the Electronic Case Filing (ECF) System.

/s/ Brittany L. Reed
Assistant United States Attorney