

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

UNITED STATES OF AMERICA

v.

21 Cr 164 (RCL)

ANNA MORGAN LLOYD

RESPONSE

Counsel for Anna Morgan-Lloyd objects to release of any Probation Records or Pre Sentence Probation Records to the “Press Coalition”. In support of this Response counsel states as follows:

- 1. Information in Pre Sentence Probation Records is collected with the understanding the information will be confidential and available only to the Court;**
- 2. Information in Probation records, including the information sought by the “Press Coalition” is collected with the understanding the information is confidential and available only to the Court;**
- 3. Release of probation records to an outside party is a violation of the privacy rights of the parties and is an intrusion into the restricted relationship among the Office of U.S. Probation, a defendant and the Sentencing Judge;**
- 4. Counsel has no objection to the Court reviewing the records in chambers;**
- 5. Counsel has no objection to the Court issuing a Notice that the 120 hours of Community Service were completed;**

6. Counsel has no objection to the Court issuing a Notice that the Order for Payment of \$500.00 restitution has been satisfied;
7. Counsel has no objection to the Court issuing a Notice that the \$10.00 payment to the Clerk of the Court has been satisfied.

WHEREFORE counsel for Anna Morgan Lloyd moves this Court to deny access to the "Press Coalition" of any restricted and heretofore private Probation records. Counsel does not object to the Court issuing a Notice that the special conditions of probation have been satisfied.

Respectfully submitted,

_____/s/_____

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