

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

**UNITED STATES OF AMERICA**

v.

**STEPHEN CHASE RANDOLPH**

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**CRIMINAL NUMBER 21-332**

**DEFENSE REPLY TO GOVERNMENT’S RESPONSE TO  
MOTION TO REVOKE DETENTION ORDER AND FOR PRETRIAL RELEASE**

Defendant Stephen Chase Randolph, by and through his undersigned attorney, submits this brief Reply to the Government’s Response in Opposition to Mr. Randolph’s Motion to Revoke Detention Order. The government cites no new or compelling information to support its claim that Mr. Randolph must be detained pretrial. The government relies almost exclusively on allegations of conduct that occurred during a relatively short period of time on one day, January 6, 2021.<sup>1</sup>

Outside of his participation in an emotionally charged rally organized by others, Mr. Randolph has led a productive, quiet, and non-violent life. In a society where liberty is the norm, there absolutely exists a combination of conditions that will reasonably assure the safety of the community. Even assuming all the allegations against Mr. Randolph are true (a fact he does not concede), his conduct on January 6, 2021, represents a miniscule fraction of his life. The government has not – and cannot – meet its burden of demonstrating by clear and convincing

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<sup>1</sup> The government has repeatedly alleged that Mr. Randolph “bragged” about his actions on January 6, 2021, when he spoke to an undercover agent several months later. Mr. Randolph disputes the government’s characterization.

evidence that Mr. Randolph poses a danger to the community if released on appropriate conditions.

Mr. Randolph incorporates by reference hereto all facts and arguments set forth in his Motion to Revoke Detention Order and for Pretrial Release. He is prepared to present testimony, evidence, and argument at the hearing scheduled for June 11, 2021.

Respectfully submitted,

/s/ Angela Halim  
ANGELA HALIM  
Assistant Federal Defender

**CERTIFICATE OF SERVICE**

I, Angela Halim, Assistant Federal Defender, Federal Community Defender Office for the Eastern District of Pennsylvania, hereby certify that I caused a copy of the Defendant's Reply to the Government's Response to the Motion to Revoke Detention Order and for Pretrial Release to be filed and served electronically through the District of Columbia District Clerk's Office Electronic Case Filing upon Robert Craig Juman, Assistant United States Attorney, United States Attorney's Office, 555 4<sup>th</sup> St., NW, Washington, DC 20530.

*/s/ Angela Halim*  
ANGELA HALIM  
Assistant Federal Defender

DATE: June 4, 2021