

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : **Crim. No.21-cr-447-05(CJN)**  
 :  
 :  
 OLIVIA MICHELE POLLOCK :  
 :  
 :  
 *(defendant)*

**Supplement to Motion to Suppress Items Seized in Van and Flatbed Trailer**

Olivia Pollock moves to suppress all items seized from inside her van, a Ford E-350, as well as any of her items recovered from the flatbed trailer with Florida Tag 170 4UK.

Olivia Pollock obtained insurance for the van she owned from at least December, 2019. She had said insurance when law enforcement searched the van on June 19, 2021. (see attached insurance documents, Exhibits 1-3).

The trailer-flat bed was owned Ben Gabriel Pollock, Olivia's brother.<sup>1</sup> (see attached insurance document, Exhibit 4).

At the time law enforcement opened Olivia's van and looked inside, it was apparent the van served as the living and sleeping quarters of its occupant, Olivia Pollock. Law enforcement took photographs of the van before, during or after their

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<sup>1</sup> He shares the first and last name of his father.

search. (see attached photographs received in discovery from the search, Exhibit 5-8).<sup>2</sup>

Respectfully submitted,

OFFICE OF ELITA C. AMATO

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**CERTIFICATE OF SERVICE**

I hereby certify that this Supplement is filed electronically through the ECF filing system on this 24<sup>th</sup> day of February 2023, thereby, providing service electronically upon all parties in this case including Government counsel.

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Elita C. Amato

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<sup>2</sup> The two photographs previously provided to the Court were taken in January of this year by the defense. Based upon a discovery letter, undersigned recognizes that the attached photographs have not been designated as sensitive, and undersigned now provides them to the Court to replace the previously submitted photographs.