

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 21-cr-28-APM
	:	
v.	:	
	:	
JASON DOLAN,	:	
	:	
Defendant.	:	

NOTICE OF MOTION FOR REVIEW OF RELEASE ORDER

The United States respectfully informs the Court and Defendant Jason Dolan of the government’s intention to file a motion for review of the release order entered earlier today by Magistrate Judge William Matthewman of the U.S. District Court for the Southern District of Florida, in case 9:21-mj-08212-BER-1.

1. On May 26, 2021, the grand jury indicted Defendant Dolan on counts of Conspiracy, in violation of 18 U.S.C. § 371; Obstruction of an Official Proceeding and Aiding and Abetting, in violation of 18 U.S.C. §§ 1512(c)(2), 2; Destruction of Government Property and Aiding and Abetting, in violation of 18 U.S.C. §§ 1361, 2; and Restricted Building or Grounds Access, in violation of 18 U.S.C. §§ 1752(a)(1). The same day, the Court issued a warrant for Defendant Dolan’s arrest.

2. On May 27, 2021, the FBI arrested Defendant Dolan in the Southern District of Florida.

3. On May 28, 2021, Defendant Dolan had his initial appearance before Magistrate Judge Bruce E. Reinhart. On the government’s motion, Judge Reinhart ordered Defendant Dolan detained during a short continuance, pursuant to 18 U.S.C. § 3142(f).

4. On June 2, 2021, Judge Matthewman conducted a detention hearing for approximately 1 hour and 47 minutes (according to the court's online docket). FBI Special Agent Justin Spence testified. The case was continued until the following day.

5. On June 3, 2021, Judge Matthewman conducted a detention hearing for approximately 2 hours and 12 minutes (according to the court's online docket). At the conclusion of the hearing, Judge Matthewman denied the government's motion for detention and ordered Defendant Dolan released. On the government's oral motion, Judge Matthewman stayed the release order until June 4, 2021, at 4 p.m., to provide the government with time to decide whether to pursue a review of the release order with this Court, pursuant to 18 U.S.C. § 3145(a)(1).

6. The government now provides notice that it intends to file such a motion.

7. Given the need to obtain and review transcripts of approximately four hearing hours, the government submits it would be appropriate to file the motion for review in approximately one week: by Friday, June 11, 2021. Section 3145(a) demands that, once filed, a motion to review a release order "be determined promptly."

8. Judge Matthewman indicated that, if the government provided notice of its intention to file a motion with this Court pursuant to Section 3145(a)(1), he would further stay his release order "for a reasonable time," consistent with Southern District of Florida Local Criminal Rule 4(a)(2).

9. Defendant Dolan's counsel in the Southern District of Florida, Michael T. van der Veen, Esq., informed Judge Matthewman that Mr. van der Veen intends to represent Defendant Dolan in this Court. The government will provide notice of this filing to Mr. van der Veen.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY



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