

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 21-cr-00303-ABJ</b>
	)	
<b>DEBORAH LEE</b>	)	
	)	
<b>Defendant</b>	)	

**DEFENDANT DEBORAH LEE'S REPLY TO GOVERNMENTS OPPOSITION OF  
MOTION TO TRANSFER VENUE**

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*Attorney for Defendant*

NOW comes Defendant, Deborah Lee, by and through her counsel of record, John M. Pierce, Esq. and files this reply to the Government's Opposition to Defendant's Motion to Change Venue.

First, the government attempts to sway this Court by focusing on other courts of this district denying motions to transfer venue; however, as commonly learned in the first year of law school and legal research, a court's decision at the same level is *not* binding on another court.

Second, the government attempts to argue that pretrial publicity related to January 6 does not support a presumption of prejudice in the district; however, the *same* government made the following argument—

“Representatives of the Committee have indicated that the relationship between the Trump Administration and the Proud Boys and other groups will be the subject of a future hearing....”

“The timing and prominence of the Committee's hearings and conclusions, and its focus on the conduct of Proud Boys, including specific descriptions of defendants in this case, heighten the need for a rigorous *voir dire* process.”

United States v. Nortean, et. al., 21-cr-175 (TJK) ECF Doc. No. 414, pp. 3-4.

This statement alone in Nortean is enough evidence to support the idea of prejudice in the district and warrants the argument for a change of venue.

Date: July 12, 2022

Respectfully submitted,

/s/ John M. Pierce  
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**CERTIFICATE OF SERVICE**

I, John M. Pierce, hereby certify that on this day, July 12, 2022, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce  
John M. Pierce