

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA §
§
VS. § CRIMINAL NO. 1:21-cr-00388
§
VIC WILLIAMS §

**REPLY TO GOVERNMENT’S OPPOSITION TO DEFENDANT’S
MOTION TO MODIFY CONDITIONS OF RELEASE**

TO THE HONORABLE JUDGE RUDOLPH CONTRERAS:

COMES NOW, Defendant, VIC WILLIAMS, by and through his attorney, Chip Lewis, and files this reply.

The Government’s pleading ignores the unique circumstances of Mr. Williams’ situation and the benign facts as described within his plea documents. See Doc #35. The Government has previously recognized (relative to undersigned counsel’s petition for pretrial diversion) the fact that Mr. Williams’ personal history is both remarkable and impressive. His professional accomplishments, while impressive, are overshadowed by his extensive charitable efforts and habitual service to communities near and far.

Given the incredible crush of cases filed as a result of the events of January 6th, the Government has been forced to paint with a broad brush in the various positions taken relative to the January 6th cases. This tactic is illustrated in its opposition to Mr. Williams’ request. The Government’s pleading lumps Mr. Williams in with the egregious conduct of others; conduct that he had nothing to do with. The Government is well aware that Mr. Williams is not part of any of the reprehensible groups responsible

for the January 6th mayhem. The Government is acutely aware that Mr. Williams' offending conduct lies at the bottom of the culpability spectrum in comparison to other charged defendants.

Given his job requirements and his perfect standing on pretrial supervision, additional home visits are unnecessary. Pretrial Services has already conducted at least four home visits and confirmed that Mr. Williams is performing as perfectly as expected. He has accepted responsibility and plead guilty to the misdemeanor charge of Parading. There is absolutely no need to continue with these home visits under these circumstances and in light of his job requirements.

Lastly, the Government ignores the fact these home visits can be conducted via teleconference, so Mr. Williams can discharge his professional responsibilities without having to cut business trips short to fly home at a moment's notice to meet with his officer in his home.

Respectfully submitted,

/s/ Chip Lewis

CHIP LEWIS

State Bar No. TX0216

Federal ID No. 24313

chip@chiplewislaw.com

1207 S. Shepherd Dr.

Houston, Texas 77019

713-523-7878 (Telephone)

713 523-7887 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of November 2021, a true and correct copy of the foregoing Reply was delivered to the Government via email.

_____/s/Chip Lewis
CHIP LEWIS