

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

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|--------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| |) | |
| v. |) | CRIMINAL NO. 21-CR-642(JDB) |
| |) | |
| |) | |
| DARRELL NEELY |) | |

**DEFENDANT’S RESPONSE TO THE GOVERNMENT’S MOTION FOR IMMEDIATE
HEARING AND MOTION TO REVOKE BOND**

Mr. Darrell Neely, through his attorney, Kira Anne West, respectfully files this response to the Government’s motion for immediate hearing and motion to revoke bond and states the following in opposition:

The Government correctly indicates in the motion, ECF #54, that Mr. Neely has been difficult to contact, but is incorrect when it states that he has the intention to flee the jurisdiction. He does not. Mr. Neely is simply trying to safely secure housing for two elderly family members in an area less expensive than the DMV area. This is no reason to revoke bond. Undersigned counsel is available for a hearing anytime except September 8, 2022, wherein undersigned counsel is before Judge Hogan all day in a pretrial motions hearing.

The government further states that it has a witness who has reported to the Government that Mr. Neely intends to flee. Mr. Neely questions the reliability and

