

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES

\*

v.

\*

22-cr-00171-JMC

STACY LEE BOND

\*

OBJECTIONS OF THE DEFENDANT TO THE DRAFT PRESENTENCE REPORT

Comes now the Defendant, through undersigned counsel, and makes the following objections to the PSR prepared in anticipation of his sentencing:

1. While Mr. Bond does not dispute that he witnessed an altercation between law enforcement and other people, he disagrees with the assertion that he was involved in an altercation with police as stated in Paragraph 14.
2. Mr. Bond is accepting responsibility for his role in the unfortunate incident on January 6, however there does not appear to be a basis for the statement in Paragraph 25 that he “...did not do less than the average participant...” Paragraph 18 accurately notes that Mr. Bond entered the US Capitol and remained inside for three minutes.
3. Paragraph 31 states that Mr. Bond was fined fifteen dollars for allowing his dog to bark excessively in 2006, however Maryland Judiciary Case Search seems to indicate that Mr. Bond

was sentenced to court costs only and that that sentence was suspended. A printout from Maryland Judiciary Case Search is attached.

4. Paragraph 34 appears to contain inaccurate information regarding a second degree assault matter in Montgomery County, Maryland. Pretrial correctly notes that Mr. Bond received the benefit of probation before judgment. Pretrial then goes on to allege a violation of an ex parte protection order on October 4, 2011, and some manner of guilty plea on November 18, 2011. The Maryland Judiciary Case Search docket does not reveal any court proceedings after August 26, 2011, and the docket reflects that Mr. Bond retained the benefit of probation before judgment. Mr. Bond disputes that he violated any court orders in that matter and also disputes that he pled guilty to anything in that matter subsequent to his initial plea on December 17, 2010. A printout from Maryland Judiciary Case Search is attached.

5. With regard to paragraphs 35-37, Mr. Bond notes that the case in Paragraph 35 is an application for a domestic violence protection order and civil in nature. Paragraphs 36 and 37 appear to refer to the same case due to the identical case numbers, charge and sentencing information. Mr. Bond acknowledges the information contained in Maryland Judiciary Case Search and the PSR, however he disputes its accuracy. Mr. Bond disputes that he was convicted of violating the order and recalls the case arising out of a mistake where he was

living in the family home and it was unknown to the State of Maryland that his wife had voluntarily moved out of the home at an earlier time.

6. Paragraph 44 incorrectly notes the sentence for a traffic offense as “5 years custody, suspend 5 days.” It should read “5 days in custody, suspend 5 days.” A printout from Maryland Judiciary Case Search is attached.

7. Mr. Bond wishes to correct the record on the year of his mother’s birth in Paragraph 50. He may have misstated it in the interview. Mr. Bond believes that his mother was born in 1943, not 1953.

8. With regard to the email addresses listed in Paragraph 57, Mr. Bond verifies that the first address listed is his but has no knowledge of the other four.

9. Paragraph 67 should note that undersigned counsel is retained and not appointed through the CJA Panel.

10. The judgment referred to in Paragraph 73 was entered jointly against Mr. Bond and his first wife.

11. Despite the dates being different, the suits referenced in Paragraphs 77 and 84 appear to be the same lawsuit.

12. With regard to Paragraph 95, Bond Brothers Construction is defunct and Mr. Bond known of no open accounts associated with it.

13. With regard to Paragraph 100, Mr. Bond's utilities are included in his rent, which is \$1,800 per month. He paid a deposit for employer's insurance of \$1,021, but that is not a monthly expense. The annual cost for this year is approximately \$5,000.

Respectfully Submitted,

/s/ Joseph W. Fay

Joseph W. Fay

Bar No.: MD17769

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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2022, a copy of the foregoing was served upon the Assistant United States Attorney assigned to this matter, Mr. Whitesel, by email at [nathaniel.whitesel@usdoj.gov](mailto:nathaniel.whitesel@usdoj.gov) and upon the probation officer, Ms. Gavito, by email at [Aidee Gavito@dcp.uscourts.gov](mailto:Aidee_Gavito@dcp.uscourts.gov) pursuant to Fed.R.Crim.Pro. 32(f)(2).

/s/ Joseph W. Fay

Joseph W. Fay

CaseSearch

District Court of Maryland

**Case Information**

Court System: **District Court For Montgomery County - Criminal**  
 Location: **Silver Spring**  
 Case Number: **1Z34033588**  
 Title: **The State of Maryland vs BOND, STACY LEE**  
 Case Type: **Citation - Municipal Infraction**  
 Filing Date: **09/28/2006**  
 Case Status: **Closed**  
 Tracking Number(s): **061002021754**

**Defendant Information**

**Defendant**

Name: **BOND, STACY LEE**  
 Race:      Sex: **Male** Height: **5'10"** Weight: **210**  
 HairColor:   EyeColor:  
 DOB:      **08/27/1964**  
 Address: **8904 N. WESTLAND DR**  
 City:      **GAITHERSBURG** State: **MD** Zip Code: **20877-0000**

**Involved Parties Information**

**Plaintiff**

Name: **State of Maryland**  
**Attorney(s) for the Plaintiff**

Name:              **OFFICE, COUNTY ATTORNEY**  
 Appearance Date: **12/12/2006**  
 Address Line 1:   **101 MONROE ST, 3RD FLOOR**  
 City:              **ROCKVILLE** State: **MD** Zip Code: **20850-0000**

**Complainant**

Name: **BRECKENRIDGE, J**

**Charge and Disposition Information**

Charge No: **1** CJIS Code: **ConvertedCode** Statute Code: **CONVERTEDCODE**  
 Charge Description: **ALLWNG DOG TO BARK DISTURB O/P** Charge Class: **Converted Degree**  
 Probable Cause:

Offense Date From: **09/28/2006** To:

Agency Name:           Officer ID:

*Disposition*

Plea:           **Other Plea**   Plea Date: **03/06/2007**

Disposition: **G**   Disposition Date: **03/06/2007**

*Converted Disposition:*

**1. COST\_AMOUNT: 7.50 SUSP\_COST: 7.50**

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**Document Information**

File Date:           **09/28/2006**

Filed By:

Document Name: **Document Issued**

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*This is an electronic case record. Full case information cannot be made available either because of legal restrictions on access to case records found in Maryland Rules, or because of the practical difficulties inherent in reducing a case record into an electronic format.*

CaseSearch

District Court of Maryland

**Case Information**

Court System: **District Court For Montgomery County - Criminal**  
Location: **Rockville**  
Case Number: **6D00256885**  
Title: **The State of Maryland vs BOND, STACY L**  
Case Type: **Criminal - SOC - Application**  
Filing Date: **10/12/2010**  
Case Status: **Closed**  
Tracking Number(s): **106040108635**

**Other Reference Numbers**

Central Complaint Number: **10050374**

**Defendant Information****Defendant**

Name: **BOND, STACY L**  
Race: **White** Sex: **Male** Height: **5'10"** Weight: **210**  
HairColor: **Brown** EyeColor: **Blue**  
DOB: **08/27/1964**  
Address: **25131 OLD HUNDRED RD**  
City: **DICKERSON** State: **MD** Zip Code: **20842-0000**

**Aliases**

Standard : **BOND, STACY LEE**

**Involved Parties Information****Plaintiff**

Name: **State of Maryland**

**Attorney(s) for the Plaintiff**

Name: **COBB, MARY**  
Appearance Date: **11/09/2010**  
Address Line 1: **50 MARYLAND AVE**  
City: **ROCKVILLE** State: **MD** Zip Code: **20850-0000**

**Officer - Arresting/Complainant**

Name: **BUSH, C**  
 AgencyName: **MONTGOMERY COUNTY POLICE-6TH DISTRICT (MONTGOMERY VILLAGE)**  
 Address: **45-A WEST WATKINS MILL ROAD**  
 City: **GAITHERSBURG** State: **MD** Zip Code: **20878**

**Charge and Disposition Information**

Charge No: **1** CJIS Code: **1-1415** Statute Code: **CR.3.203**  
 Charge Description: **ASSAULT-SEC DEGREE** Charge Class: **Misdemeanor**  
 Probable Cause: **YES**  
 Offense Date From: **10/12/2010** To:  
 Agency Name: **MONTGOMERY COUNTY POLICE-6TH DISTRICT (MONTGOMERY VILLAGE)** Officer ID: **2482**  
*Disposition*  
 Plea: **Guilty** Plea Date: **12/17/2010**  
 Disposition: **PBJS** Disposition Date: **12/17/2010**  
*Converted Disposition:*  
**1. FINE\_AMOUNT: 1000.00 COST\_AMOUNT: 22.50 CICF\_AMOUNT: 35.00 SUSP\_FINE: 750.00**

**Warrants Information**

Type	Issue	Last Status	Status Date
Bench Warrant - Failure to Pay	03/14/2011	Warrant Closed	08/26/2011

**Bond Setting Information**

Bail Date: **03/14/2011**  
 Bail Setting Type: **Set by Judge**  
 Bail Amount: **\$307.50**

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Bail Date: **10/12/2010**  
 Bail Setting Type: **Hold in Default**  
 Bail Amount: **\$2,600.00**

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Bail Date: **10/13/2010**  
 Bail Setting Type: **Hold in Default**  
 Bail Amount: **\$10,000.00**

**Document Information**

File Date: **10/12/2010**  
 Filed By:  
 Document Name: **Document Issued**

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File Date: **10/12/2010**  
 Filed By:  
 Document Name: **Initial Appearance**

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File Date: **10/12/2010**  
 Filed By:  
 Document Name: **Committed**



File Date: **10/13/2010**  
Filed By:  
Document Name: **Bail Review Held**

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File Date: **10/13/2010**  
Filed By:  
Document Name: **Committed**

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File Date: **10/14/2010**  
Filed By:  
Document Name: **Bond Posted**

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File Date: **10/14/2010**  
Filed By:  
Document Name: **Release From Commitment**

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File Date: **12/17/2010**  
Filed By:  
Document Name: **SUPERVISION REFERRAL**

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File Date: **03/14/2011**  
Filed By:  
Document Name: **Warrant Issued**

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File Date: **03/14/2011**  
Filed By:  
Document Name: **Bail Set**

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File Date: **08/26/2011**  
Filed By:  
Document Name: **Warrant Recall**

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CaseSearch

District Court of Maryland

**Case Information**

Court System: **District Court For Montgomery County - Criminal**  
 Location: **Rockville**  
 Case Number: **6D00275757**  
 Title: **The State of Maryland vs BOND, STACY**  
 Case Type: **Criminal - SOC - Application**  
 Filing Date: **10/05/2011**  
 Case Status: **Closed**  
 Tracking Number(s): **116337036255**

**Other Reference Numbers**

Central Complaint Number: **110474**

**Defendant Information**

**Defendant**

Name: **BOND, STACY**  
 Race: **White** Sex: **Male** Height: **5'10"** Weight: **180**  
 HairColor: **Black** EyeColor: **Brown**  
 DOB: **08/27/1964**  
 Address: **34 CROSS LAUREL CT**  
 City: **GERMANTOWN** State: **MD** Zip Code: **20876-0000**

***Attorney(s) for the Defendant***

Name: **OFFICE OF THE PUBLIC DEFENDER**  
 Appearance Date: **10/28/2011**  
 Address Line 1: **191 E JEFFERSON STREET**  
 City: **ROCKVILLE** State: **MD** Zip Code: **20850-0000**

**Involved Parties Information**

**Plaintiff**

Name: **State of Maryland**  
***Attorney(s) for the Plaintiff***

Name: **HAGAN, TIMOTHY W**  
 Appearance Date: **11/07/2011**  
 Address Line 1: **1100 Agate Trail**  
 City: **Dayton** State: **OH** Zip Code: **45459**

**Officer - Arresting/Complainant**

Name: **D'UVA, S**  
AgencyName: **MONTGOMERY COUNTY SHERIFF'S DEPT**  
Address: **50 COURTHOUSE SQ., T8**  
City: **ROCKVILLE** State: **MD** Zip Code: **20850**

**Charge and Disposition Information**

Charge No: **2** CJIS Code: **2-0254** Statute Code: **FL.4.509**  
Charge Description: **VIOLATE EXPARTE/PROT ORDER** Charge Class: **Misdemeanor**  
Probable Cause: **YES**  
Offense Date From: **10/04/2011** To:  
Agency Name: **MONTGOMERY COUNTY SHERIFF'S DEPT** Officer ID: **6299**  
*Disposition*  
Plea: **Guilty** Plea Date: **11/18/2011**  
Disposition: **G** Disposition Date: **11/18/2011**  
*Converted Disposition:*  
**TERM\_YRS: 00 TERM\_MOS: 00 TERM\_DAYS: 090 SUSPENDED\_SENT: X SUSP\_TERM\_YRS: 00**  
**SUSP\_TERM\_MOS: 00 SUSP\_TERM\_DAYS: 075 PROBATION: 2 PROB\_END\_DATE: 12/08/2012**  
**1. CREDIT\_TIME\_SERVED: 0005 JAIL: X FINE\_AMOUNT: 1000.00 COST\_AMOUNT: 22.50 CICF\_AMOUNT:**  
**35.00 SUSP\_FINE: 1000.00**

**Bond Setting Information**

Bail Date: **10/05/2011**  
Bail Setting Type: **Hold in Default**  
Bail Amount: **\$5,000.00**

Bail Date: **10/06/2011**  
Bail Setting Type: **Hold in Default**  
Bail Amount: **\$10,000.00**

**Document Information**

File Date: **10/05/2011**  
Filed By:  
Document Name: **Document Issued**

File Date: **10/05/2011**  
Filed By:  
Document Name: **Initial Appearance**

File Date: **10/05/2011**  
Filed By:  
Document Name: **Committed**

File Date: **10/06/2011**  
Filed By:  
Document Name: **Bail Review Held**

File Date: **10/06/2011**

Filed By:

Document Name: **Committed**

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File Date: **10/07/2011**

Filed By:

Document Name: **Bond Posted**

---

File Date: **10/07/2011**

Filed By:

Document Name: **Release From Commitment**

---

File Date: **11/18/2011**

Filed By:

Document Name: **Committed**

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File Date: **11/18/2011**

Filed By:

Document Name: **SUPERVISION REFERRAL**

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DISTRICT COURT OF MARYLAND

Case Information

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Court System: **DISTRICT COURT FOR BALTIMORE CITY (PATAPSCO AVE) - TRAFFIC SYSTEM**  
 Citation Number: **00000FD39021** Case Status: **CLOSED CASE**  
 Violation Date: **08/19/2008** Violation Time: **02:00 PM**  
 Violation County: **BALTIMORE CITY (PATAPSCO AVE)**  
 District Code: **01** Location Code: **02**  
 AgencyName: **BPD-SOUTHERN DISTRICT**  
 Officer ID: **F852**

Defendant Information

Defendant Name: **BOND, STACY LEE**  
 Address: **8904 N WESTLAND DR**  
 City: **GAITHERSBURG** State: **MD** Zip Code: **20877**  
 Race: **WHITE, CAUCASIAN, ASIATIC INDIAN, ARAB**  
 Sex: **M** Height: **510** Weight: **210**  
 DOB: **08/27/1964**

Charge Information

Charge: Article: **TA** Sec: **16** Sub-Sec: **303** Para: **C** Code:  
 Description: **PERSON DRIVING MOTOR VEH. ON (HWY., PUBLIC USE PROPERTY) ON SUSPENDED LIC. & PRIVILEGE**  
 Location Stopped: **100 E FORT AVE**  
 Contributed to Accident?: **NO** Personal Injury?: **NO**  
 Fine: **0**  
 Vehicle Tag: **772M461** State: **MD** Vehicle Description: **07CHEV**

Disposition Information

Plea: **NOT GUILTY**  
 Disposition: **GUILTY**  
 Disposition Date: **01/12/2009**  
 Contributed To Accident: **NO** Personal Injury?: **NO**  
 Sentence Date: **01/12/2009**  
 Sentence Time: Yrs: **00** Mos: **00** Days: **005**  
 Suspended Time: Yrs: **00** Mos: **00** Days: **005**  
 Costs: Fine: **0** CourtCost: **22.5** CICF: **35**  
 Suspended: Fine: **0** CourtCost: **22.5** CICF Cost: **35**

Related Person Information

Name: **KULWICKI, MARK**  
 Connection: **DEFENSE ATTORNEY**  
 Address: **145 BONIFANT ROAD**  
 City: **SILVER SPRINGS** State: **MD** Zip Code: **20905**

Event History Information

Event	Date	Comment
<b>CMIT</b>	<b>2009-01-12</b>	<b>DEFENDANT COMMITTED;011209;BCJ</b>
<b>SCHG</b>	<b>2009-01-12</b>	<b>T453;A TO C</b>
<b>DCHG</b>	<b>2009-01-27</b>	<b>T;011209;G ;0002250;0002250;00;000; ; ;00000026;9A1</b>
<b>DCHG</b>	<b>2009-01-27</b>	<b>1;0000; ;0000005;0000000;011909; ; ;</b>

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