

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 21-CR-738 (BAH)</b>
	:	
<b>v.</b>	:	
	:	
<b>MICHAEL OLIVERAS,</b>	:	
	:	
<b>Defendant</b>	:	

**DEFENDANT MICHAEL OLIVERAS' OPPOSITION TO CONVERT THE  
VIDEOCONFERENCE PRETRIAL HEARING TO AN IN-PERSON HEARING**

The defendant, Michael Oliveras, through counsel, Lori Koch, (Lisa Evans Lewis, appearing) respectfully objects to the government's request to convert the videoconference hearing scheduled for Friday, January 6, 2023, to an in-person hearing. On December 21, 2021, Mr. Oliveras was released on bond pursuant to court order after his arrest for conduct that occurred at the U.S. Capital on January 6, 2021. Mr. Oliveras resides in New Jersey and is being supervised by the Camden, New Jersey office of U.S. Pretrial Services. Mr. Oliveras' defense attorney, Lori Koch, Assistant Federal Public Defender in the District of New Jersey is unavailable to attend an in-person conference on January 6, 2023, as she is on vacation until Monday January 9, 2023. Undersigned counsel, Lisa Evans Lewis, Assistant Federal Public Defender in the District of New Jersey, who is assisting Ms. Koch with this matter, is also unable to attend an in-person hearing in Washington. D.C. due to scheduling conflicts. Ms. Lewis, however, is able to participate in the currently scheduled videoconference hearing.

In considering the government's request, the Court should be aware that Mr. Oliveras was in contact with his U.S. Pretrial Services officer in New Jersey prior to the filing of the

violation petition as well after the petition was filed. Mr. Oliveras spoke with his New Jersey U.S. Pretrial officer on the phone on December 22<sup>nd</sup> and also reported-in by phone on December 30, 2022. He also participated in a virtual home visit with the same officer on January 2, 2023 and he has scheduled an in-person home visit for January 9, 2023. Finally, through undersigned counsel this morning, Mr. Oliveras has provided his officer with two pay stubs form his current employer.

For all reasons stated, Defendant Michael Oliveras respectfully requests that the videoconference hearing scheduled for Friday January 6, 2023, not be converted to an in-person hearing. Additionally, if the Court is inclined to have an in-person hearing we are respectfully requesting that it be scheduled on a day when Ms. Koch is available.

Respectfully submitted,

*s/ Lisa Evans Lewis*

LISA EVANS LEWIS  
Assistant Federal Public Defender  
District of New Jersey

for Lori Koch  
Assistant Federal Public Defender  
District of New Jersey

Dated: January 4, 2023