

Here, it is respectfully submitted that this Court reopen and reinstate Thomas' bond application because Thomas has effectuated the proposed plan as I presented to this Court on October 16, 2023, so as to address the concerns this Court stated in its order dated August 28, 2023. The plan was implemented by obtaining adequate housing through his Aunt and Uncle, has undergone a mental health evaluation on October 27, 2023, has agreed to not pursue or use his medical marijuana prescription while out on bond unless further Court approval is granted and has agreed to respect all pretrial staff and will abide by all orders or requests made by pretrial staff in a timely and suitable fashion.

In addition, Thomas' stint at the D.C. jail has been extremely difficult. For example, he has been assaulted numerous times in the past couple weeks. In result of these assaults, the jail placed him in "the hole" for his "own safety". As such, I believe he has learned his lesson on the importance of compliance during the pretrial stages of his case and will be seriously deterred to repeat the same type of behavior.

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

UNITED STATES OF AMERICA,)
)
)
 v.) No. 21-CR-53 (CJN)
)
 ISAAC ANTHONY THOMAS,)
)
)
 Defendant.)

**THOMAS’S MEMORANDUM OF LAW IN SUPPORT OF HIS MOTION
TO REOPEN AND REINSTATE HIS BOND APPLICATION**

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THOMAS' NEW PROPOSAL SINCE OCTOBER 6, 2023

A. Thomas Has Obtained Adequate Housing

On November 15, 2023, pretrial services met with Thomas' Aunt, Mrs. Baker and Uncle, Mr. Baker. While there were some noted concerns such as there being an antique gun in the home and Thomas' Aunt and Uncle voicing that they had concerns regarding his disrespectful attitude, these concerns are now resolved. First, Thomas' Aunt and Uncle have agreed to remove the antique gun from the home. Second, despite their concerns regarding Thomas' attitude in the past, Mr. and Mrs. Baker have agreed to help Thomas with housing and be supportive family members, with a plan on trying to guide him so he can transition to his own housing, which will only have a positive impact on Thomas.

B. Thomas Agreed to Undergo a Mental Health Evaluation on October 16, 2023 and To Date Has Already Completed Such Evaluation

As Thomas was ordered by this Court on August 18, 2023, to cooperate with PSA and get an appropriate assessment and sign a release of information form, on October 27, 2023, Thomas underwent a mental health evaluation. (*See Confidential Department of Behavioral Health Evaluation*). While the details of the necessary mental health evaluation are mostly confidential, the evaluation was complete and Thomas has signed the subject release. It is my understanding that his demeanor

was professional, engaging, and he was respectfully compliant throughout the entire process.

C. Marijuana

While Thomas' medical marijuana status was an issue, he no longer wishes to attempt to treat with medical marijuana during the pendency of this case, unless he receives further court approval.

D. Respect for the Process and Pretrial Staff

Thomas agrees to respect all pretrial staff and will abide by all orders or requests made by pretrial staff in a timely and suitable fashion. He acknowledges his prior violations and attitude towards the process and staff such as not reporting to his supervising officer and attempting to make situations more convenient for himself. He agrees and intends to prioritize the seriousness of the process and handle such in a mature, considerate, and reasonable way.

CONCLUSION

For all of the above-mentioned reasons, and more, Mr. Thomas respectfully requests his immediate release, or restore him back to his previous status, on an emergency basis, so as to afford him the ability to meaningfully participate in his defense.

Dated: November 21, 2023

Respectfully Submitted,

/s/ Steven Alan Metcalf II

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been served upon counsel for all parties to this proceeding as identified below through the court's electronic filing system as follows:

/s/

STEVEN A. METCALF II

Attorney for Isaac Anthony Thomas

Dated: 11/21/2023