

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

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**United States**

**v.**

CASE NO: 1:21-mj-00034-CRC

**Thomas Robertson**

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**DEFENSE SUPPLEMENTAL BRIEF IN SUPPORT OF ITS OPPOSITION  
MOTION TO REVOKE RELEASE ORDER**

The Defense submits this supplemental brief to respond to the Government's supplemental brief. The M228 Fuzes shown identified in their motion is a practice grenade fuze. It is used to simulate a grenade. Furthermore, this was used as a training device but is not a real grenade. There is a hole at the bottom and the top. Under information and belief, the light blue color and the whole at the bottom let the person know it is not real<sup>1</sup>.

The Defense also submits the affidavit of Hunter Robertson (*See attached*) regarding the possession of the M4 rifle recovered from his home.

Finally, Mr. Robertson is amenable to house arrest or GPS monitoring. He has never missed a check in appointment with his pretrial services officer and followed all the rules of his pretrial services officer. He turned himself when his pretrial services officer requested him to do so.

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<sup>1</sup> <https://www.youtube.com/watch?v=ujv1DcZD40I>

Respectfully submitted  
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