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Attorney for Defendant, RUSSELL TAYLOR

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

THE UNITED STATES OF
AMERICA,

Plaintiff,

vs.

RUSSELL TAYLOR,

Defendants.

Case No. 1:21-CR-00392-RCL

**REPLY IN SUPPORT OF MOTION
TO MODIFY RELEASE
CONDITIONS**

JUDGE: ROYCE C. LAMBERTH

REPLY

Mr. Taylor wishes the Court to know that he agrees the Government has correctly, fairly, and properly informed the Court that an overseas shipment of “two knives and 2 axes w/sheaths” was to be sent to Mr. Taylor. However, the circumstance of this shipment warrants explanation. At the outset, Mr. Taylor reports that the actual package was **not** delivered to Mr. Taylor as the shipment was cancelled by Mr. Taylor. This event, while accurately reported to the Court, does not reflect the totality of the situation. Important facts for the Court to know:

1. Mr. Taylor works for a business that organizes road rallies, which hold amateur competitive events for owners of four-wheeled vehicles. The event tasks a driver and navigator to set their own course to interactive checkpoints and a finish line, in an on-road/off-road rally mixed with a scavenger hunt in wildernesses type environments.
2. The items at issue were meant as prizes for the business to give to the winners of the event. The items at issue are rationally related to the event of outdoor activities and four-wheeling. The event is partially sponsored by the organization which sells the items at issue.
3. Mr. Taylor never had any intention to own or keep these items. They were strictly and only to be given to people, other than Taylor, at the pending events.
4. Because Mr. Taylor currently works from his home, the items were sent to his home address. Because of the Courts Order and Mr. Taylor's desire to comply, the shipment was cancelled, and the items never reached Mr. Taylor.
5. Mr. Taylor never took possession of any weapons. The cancelled shipment never arrived nor reached Mr. Taylor. Accordingly, Mr. Taylor was not in possession, even momentarily, of said items.

While the Government's response is a true and fair representation of what occurred, the circumstances of the matter do not accurately report what transpired nor the purpose behind the reported shipment. Mr. Taylor was never to be the owner nor keeper of the items, they were business related, meant for others, part of a rationally related event, and items that were sponsor related.

In this case, a correctly, fairly, and accurately reported event does not reflect the underlying reality of what took place. Mr. Taylor reports he is still in compliance

with all terms and conditions, has not possessed any “knives or axes” and this misunderstanding should not affect his request.

Mr. Taylor requests the Court grant his request or in the alternative allow the parties to address the issue at the next hearing currently set.

Dated: June 23, 2022

LAW OFFICE OF DYKE E. HUISH

/s/Dyke E. Huish

Attorney for Russell Taylor