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

UNITED STATES OF AMERICA \*

\*

v. \* Criminal No. 22-cr-244 (TNM)

Status Conference: September 30, 2022

HATCHETT SPEED,

\*

Defendant.

## <u>DEFENDANT'S UNOPPOSED MOTION TO ATTEND REQUIRED "DRILL" DATES</u> <u>AS A NAVY RESERVIST</u>

COME NOW the defendant, Hatchett Speed, by and through counsel, and respectfully requests that he be permitted to attend his monthly "drill" requirement, at **Joint Base Andrews Naval Air Facility Washington**, located in Clinton, Maryland. In support of this motion, Mr. Speed states the following:

- 1. Mr. Speed was arrested on the above-captioned matter on June 22, 2022. He appeared before Magistrate Judge Zia M. Faruqui on June 23, 2022.
- 2. On June 23, 2022, Mr. Speed was released by this Court into the High Intensity Supervision Program (HISP), monitored by the Pretrial Services Agency (PSA) for the District of Columbia, and ordered into Home Detention.
- 3. As of the filing of this motion, Mr. Speed has been compliant with the terms of his pretrial supervision.
- 4. Mr. Speed is a member of the Navy Reserves, and as such, is required to report to "drill" once a month, as designated by his command. "Drill" takes place on a Saturday and Sunday from 7:30 AM until roughly 4:00 PM.

- 5. Reporting to his "drill" assignment is currently Mr. Speed's only means of employment.
- 6. Pursuant to Condition 7(p) of the Order Setting Conditions of Release (Docket # 10), Mr. Speed is restricted to his residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer.
- 7. As such, Mr. Speed should be permitted to leave his home in order to go to work, provided that he provide the relevant information to his pretrial services officer.
- 8. However, the pretrial services supervisor is requiring a written motion to be filed each time Mr. Speed wishes to go to work.
- 9. It would be both efficient and in the interest of justice for this Honorable Court to grant a standing order, allowing Mr. Speed to attend drill on August 13<sup>th</sup> and 14<sup>th</sup>, 2022, as well as all future "drill" assignments, provided that he gives advanced notice of the date to his pretrial services officer.
- 10. Accordingly, Mr. Speed respectfully requests that he be allowed to attend "drill" this weekend and all future weekends, as assigned.
- 11. Undersigned counsel has spoken to Assistant United States Attorney Alexis Loeb who states that she has no opposition to this motion.
- 12. A draft order implementing this request is appended hereto.

Respectfully Submitted,

/s/ Courtney S. Dixon

Courtney S. Dixon, DC Bar # 1766415 Assistant Federal Public Defender Counsel for Hatchett Speed 1650 King Street, Suite 500 Alexandria, VA 22314 (703) 600-0879 (0) (703) 600-0880 (F) Courtney\_Dixon@fd.org

## **CERTIFICATE OF SERVICE**

I hereby certify that on the  $11^{th}$  day of August, 2022, the undersigned electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

AUSA Alexis Loeb Assistant United States Attorney 555 4<sup>th</sup> Street, NW Washington, DC 20530

By: /s/ Courtney S. Dixon
Courtney S. Dixon, DC Bar # 1766415
Assistant Federal Public Defender
Counsel for Hatchett Speed
1650 King Street, Suite 500
Alexandria, VA 22314
(703) 600-0879 (0)
(703) 600-0880 (F)
Courtney\_Dixon@fd.org