

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF COLUMBIA

UNITED STATES)
)
V.) Case: 22-cr-00166-MAU
)
JOHN GEORGE TODD,)
)
Defendant.)

DEFENDANT JOHN GEORGE TODD’S RESPONSE AND OPPOSITION TO
UNITED STATES REGARDING REVOCATION OF RELEASE

Comes now defendant John George Todd, by undersigned counsel, with this
response and opposition to the

John George Todd is an Afghanistan combat veteran who suffers from
combat-related PTSD. Mr. Todd has suffered several traumatic bouts of mental
health episodes and has been continuously under the care of Veterans
Administration (VA) mental health counselors and treatment physicians. On April
12, 2023, Mr. Todd suffered a minor incident stemming from issues relating to his

wife and another man. For a short time on April 12, Mr. Todd was engaged in a commotion in which police were called.

No one was harmed in the incident other than Mr. Todd himself, who suffered some superficial cuts, which has been described as suicidal ideation.

Our firm has reached out to Mr. Todd and Mr. Todd's support community. Mr. Todd has had a post-incident mental health evaluation by his psychologist, Dr. Mark Sundahl of the Kansas City Department of Veterans Affairs. Dr. Sundahl reports that John George Todd did have issues with alcohol on the night in question, but has recently had a change in his psychiatric medication.

Dr. Sundahl reports that he has increased the dosage of certain medications for Mr. Todd. Dr. Sundahl reports that John George Todd is doing well under the circumstances, and that the VA is increasing its outpatient treatment regiment regarding Mr. Todd.

Mr. Todd spent a week in-patient over the past two weeks, whereupon medical and mental health professionals evaluated Mr. Todd intensely. His medication levels are now fully adjusted; and Mr. Todd and the VA have a comprehensive plan for outpatient recovery.

Mr. Todd's doctors do not believe Mr. Todd is a threat to himself or others at the present time. Incarceration would only exacerbate Mr. Todd's health and mental health problems.

Undersigned counsel also disputes whether Mr. Todd was in possession of weapons on the night in question. Mr. Todd did possess a knife and/or razor blade on that date; but these instruments were in Mr. Todd's pockets and were not used, brandished or presented in any way as weapons.

Significantly, Mr. Todd is a misdemeanor defendant who would not likely be sentenced to extensive jail time if convicted of the charges in this case. Mr. Todd should not be incarcerated awaiting trial, as such incarceration would pose the serious risk of over punishing Mr. Todd, even in the event of possible conviction in this matter.

Consequently, defense counsel asks for an order continuing Mr. Todd's pretrial release and allowing Mr. Todd to complete his treatment plan.

Date: April 27, 2023

Respectfully Submitted,
/s/ John M. Pierce
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CERTIFICATE OF SERVICE

I hereby certify that, on April 27, 2023, this motion was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce

John M. Pierce