

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA

**ATTORNEY DECLARATION**

– against –

JULIAN ELIE KHATER,

**Docket No. 21-CR-00222 (TFH)**

Defendant.

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CHAD SEIGEL, ESQ., an attorney duly admitted *pro hac vice* to practice in this Court, hereby declares the following to be true under penalty of perjury:

1. I am a partner at Tacopina Seigel & DeOreo, counsel for Julian Khater, the defendant in this prosecution and, as such, am fully familiar with the facts and circumstances made in support of the instant motion.


2. This declaration is offered in support of defendant Julian Khater's motion for an Order granting his pretrial release, pursuant to 18 U.S.C. § 3142.

3. Defense counsel has received 18 letters from family members, a family friend, and a former co-worker of defendant Julian Khater, attesting to his upstanding history and characteristics. True and accurate copies of those letters are annexed hereto as Exhibits A through R.

4. In addition, annexed hereto as Exhibit S are true and correct copies of orders and/or appearance bonds relating to defendants who were charged in connection with the January 6<sup>th</sup> Capitol riot and released on bail.

WHEREFORE, for the reasons set forth in the accompanying memorandum of law, your declarant respectfully prays that an Order be entered granting the relief sought in the instant Motion, together with such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
April 20, 2021

  
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