

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

UNITED STATES OF AMERICA,

v.

Criminal Action No. 19-cr-18 (ABJ)

ROGER J. STONE, JR.,

Defendant.

**ROGER J. STONE, JR.'s RESPONSE TO
COURT'S ORDER DATED JUNE 25, 2020**

In response to the Court's Order, dated June 25, 2020, undersigned counsel provide the following information:

1. The Bureau of Prisons ("BOP") extended Stone's original surrender date of April 23, 2020 as the result of the Court's April 16, 2020 order denying Stone's motion for a new trial. Dkt. # 361.

2. The order states that Stone "must surrender for service of his sentence at the institution designated by the Bureau of Prisons at such time as he is notified by the U.S. Probation or Pretrial Services Office, but no earlier than fourteen days after the date of this order [i.e., no earlier than April 30, 2020]." Dkt. # 361.

3. The day after the Court entered its April 16, 2020 order, counsel spoke to BOP by telephone and inquired as to whether a surrender date had been set and was informed that, following Stone's sentencing, BOP set the surrender date for April 23, 2020.

4. Counsel informed BOP of the Court's order requiring that the surrender date be no earlier than April 30, 2020 and was told that a new surrender date would be set and that, due to COVID-19, the new date would likely be a few months out.

5. Counsel advised BOP that, given Stone's medical conditions reflected in the Presentence Report, a surrender date as late as possible would be advisable.

6. BOP subsequently informed counsel that Stone would be required to surrender on June 30, 2020 and, on April 30, 2020, the Probation Office sent Stone a letter that reflects his designation to FCI Jesup and his surrender date of June 30, 2020.

7. In addition, on or about June 1, 2020, counsel called BOP to request that Stone's June 30, 2020 surrender date be extended and was instructed to submit the request via email, which counsel did, as reflected in the attached correspondence.

8. Apart from an automated response acknowledging receipt of the email request, BOP did not respond to counsel regarding the request.

9. On or about June 10, 2020, government counsel informed undersigned counsel that he had been in contact with BOP and had been informed that BOP was no longer extending surrender dates based on COVID-19 and that, therefore, BOP would not be changing Stone's June 30, 2020 surrender date.

10. BOP's determination led to discussions between the parties that ultimately resulted in Stone's decision to file his Unopposed Motion to Extend Surrender Date.

Dated: June 26, 2020

Respectfully Submitted,

/s/ Seth Ginsberg
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