

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

JONAS MURPHY,

Defendant.

Case No: 25-cr-00389-EGS

The Hon. Emmet G. Sullivan

Sentencing Date: June 30, 2026

**JOINT RESPONSE TO THE COURT’S MINUTE ORDER RELATING TO  
COMMUNITY SERVICE**

On June 4, 2026, the Court entered a Minute Order directing the parties and the Probation Office to submit proposals for achieving the Court’s stated objective of requiring the defendant, Jonas Murphy, to perform substantial community service, whether as a condition of probation or as a condition of supervised release, while taking into account Mr. Murphy’s residence in Milton, Delaware.

The parties—the United States of America, through its authorized representative, Assistant United States Attorney Kondi Kleinman, and Mr. Murphy, through his counsel, G. Allen Dale—and the Probation Office, through its representative, Sentencing Guideline Specialist Katie Freeman, (hereafter “the parties”) respectfully advise the Court that they have conferred and consulted with the United States Probation Office for the District of Delaware, which will be responsible for supervising Mr. Murphy’s compliance with any community service requirement. These consultations were undertaken to address the Court’s concerns and to explore means of achieving the Court’s stated objectives.

The parties jointly advise the Court that the organization where Mr. Murphy is currently volunteering (see Defendant's Sentencing Memorandum, DK 23, Exhibit 3) is regarded by the Delaware Probation Office as an exemplary location for the completion of community service. The Delaware Probation Office further advises that it maintains relationships with several other approved community service sites where probationers and supervisees regularly fulfill court-ordered service obligations. These include local ministries that provide meals, clothing, and other assistance to individuals experiencing homelessness; charitable organizations engaged in home construction and the operation of resale shops; soup kitchens; and local churches that are consistently in need of volunteer support. In addition, the Probation Office reports that local SPCAs (Society for the Prevention of Cruelty to Animals) are frequently seeking volunteers.

Accordingly, the parties submit that the Court's objective of requiring Mr. Murphy to complete a substantial number of community service hours would not be impeded by the fact that he resides in Milton, Delaware, as there are numerous suitable and approved opportunities available within his community.

Rather than identifying specific organizations or locations in advance, the parties believe it would be more prudent for the Court to impose whatever community service requirement it deems appropriate, whether as a condition of Mr. Murphy's supervised release or probation. Mr. Murphy can then work with his supervising probation officer to ensure that he fulfills the community service component of his sentence in a manner consistent with the Court's directives. By contrast, if the parties were to submit a list of approved organizations at the outset and the Judgment and Commitment Order were to limit service to those entities, any subsequent unavailability of one or more of those organizations could unnecessarily complicate Mr. Murphy's ability to complete the required service. Allowing the probation officer flexibility in approving

appropriate placements would better ensure that the community service obligation can be satisfied consistent with the Court's intent.

Finally, the parties understand and appreciate the Court's concern regarding the imposition of a substantial community service requirement and respectfully submit that Mr. Murphy will have no difficulty completing such service in the Milton, Delaware area. The parties further represent that all community service performed by Mr. Murphy will be monitored by the United States Probation Office for the District of Delaware and will be completed only through charitable organizations approved by the United States Probation Office for the District of Delaware.

Date: June 9, 2026

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of June 2026, I will cause to be electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record. I will also send via email a copy of the foregoing to: Kondi Kleinman, Esq. Assistant United States Attorney at [kondi.kleinman2@usdoj.gov](mailto:kondi.kleinman2@usdoj.gov) and Katie Freeman, Senior United States Probation Officer at [katie\\_freeman@dcp.uscourts.gov](mailto:katie_freeman@dcp.uscourts.gov)

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