

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States v. Holley

Criminal Action No. 25-292 (EGS) (D.D.C. Dec. 3, 2025) · No. Criminal Action No. 25-292 (EGS) · Decided December 3, 2025

SUMMARY

The United States District Court for the District of Columbia denies Jordan Holley’s motion to reinstate an earlier order releasing him under strict home-incarceration conditions. The court concludes that the charged offense, the weight of the evidence, Holley’s history and characteristics, and the danger posed by release support continued pretrial detention under the Bail Reform Act. The court finds that the proposed conditions would not reasonably assure community safety.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Emmet G. Sullivan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	December 3, 2025
DOCKET	Criminal Action No. 25-292 (EGS)
DISPOSITION	other
PROCEDURAL POSTURE	The defendant moved to reinstate pretrial release conditions after the government obtained review of a magistrate judge's release order and the chief judge ordered detention. Following a detention hearing, the district court denied the motion and ordered the defendant detained pending trial.
STANDARD OF REVIEW	The court independently evaluated pretrial detention under the Bail Reform Act, considering whether the government proved by clear and convincing evidence that no condition or combination of conditions would reasonably assure community safety.
PRECEDENTIAL VALUE	Published district court memorandum opinion; no reporter citation provided

TOPICS

- bail
- criminal procedure
- presumptions
- evidence

PRACTICE AREAS

criminal procedure

pretrial detention

bail and release conditions

evidence and proffers

QUESTIONS PRESENTED

1. Whether Holley rebutted the statutory presumption that no condition or combination of conditions would reasonably assure community safety.
2. Whether the proposed home-incarceration and high-intensity-supervision conditions would reasonably mitigate the danger posed by Holley's release.
3. Whether the government proved by clear and convincing evidence that Holley should remain detained pending trial.

HOLDINGS

1. Holley failed to rebut the rebuttable presumption under 18 U.S.C. § 3142(e)(3)(E) that no condition or combination of conditions would reasonably assure the safety of the community.
2. The proposed conditions, including home incarceration, GPS monitoring, electronic-device restrictions, and parental custodianship, could not reasonably mitigate the danger posed by Holley's release.
3. The government established by clear and convincing evidence that no condition or combination of conditions could reasonably assure the safety of the community, so Holley was properly detained pending trial.

KEY QUOTATIONS

“In our society liberty is the norm, and detention prior to trial or without trial is the carefully limited exception.” (at 8)

“The government has therefore shown by clear and convincing evidence that no conditions can reasonably assure the safety of the community.” (at 29)

FACTUAL BACKGROUND

Holley communicated online with an undercover FBI task-force officer posing as the father of a nine-year-old girl and repeatedly described plans to have sexual intercourse with the purported child. He traveled from Maryland to Washington, D.C., to meet the undercover officer and brought a mask, sex toys, lubricant, and condoms. Electronic-device records also contained extensive communications in which Holley described or advocated sexual abuse of children, including alleged prior encounters and plans to abuse multiple children.

PROCEDURAL HISTORY

Magistrate Judge Matthew Sharbaugh initially denied the government's request for detention and released Holley to high-intensity supervision with home incarceration and extensive electronic-device restrictions. The government sought review and appeal, and Chief Judge James Boasberg ordered Holley detained. After Holley was indicted and moved to reinstate the original release conditions, the district court held a detention hearing,

considered additional evidence from searches of Holley's electronic devices, denied the motion, and ordered continued detention.

DISPOSITION

other

CASES CITED

- United States v. Salerno, 481 U.S. 739, 754-55 (1987)
- United States v. Simpkins, 826 F.2d 94, 98 (D.C. Cir. 1987)
- United States v. Munchel, 991 F.3d 1273, 1279-80, 1282 (D.C. Cir. 2021)
- United States v. Farina, No. 25-cr-232, 2025 WL 2651249, at *2 (D.D.C. Sept. 16, 2025)
- United States v. Blanchard, No. 18-MJ-101, 2018 WL 4964505, at *4 (D.D.C. Oct. 15, 2018)
- United States v. Alatishe, 768 F.2d 364, 371 (D.C. Cir. 1985)
- United States v. Garner, No. CR 24-533, 2025 WL 1575848, at *3 (D.D.C. Mar. 11, 2025)
- United States v. Oglesbee, Minute Entry (July 31, 2020), Case No. 22-cr-177
- United States v. Breedon, No. 15-MJ-0506, 2015 WL 13310427, at *1, *6-*7 (D.D.C. Nov. 16, 2015)
- United States v. Beauchamp-Perez, 822 F. Supp. 2d 7, 10 (D.D.C. 2011)
- United States v. Johnston, No. 17-MJ-0046, 2017 WL 4326390, at *4 (D.D.C. Sept. 28, 2017)
- United States v. Scott, No. 24-cr-287, 2024 WL 3887394, at *5-*7 (D.D.C. Aug. 21, 2024)
- United States v. Brockerman, No. 25-cr-133
- United States v. Cunningham, Order, ECF No. 54 in Case No. 23-CR-7
- United States v. Willis, No. 22-MJ-122
- United States v. Taylor, No. 21-MJ-00699
- United States v. Ali, No. 24-cr-43
- United States v. Hoppe, No. 23-CR-102, 2024 WL 1990452, at *6 (D.D.C. May 6, 2024)
- United States v. White, Order, ECF No. 6 in Case No. 24-cr-340
- United States v. James Carroll, No. 24-cr-544
- United States v. Martinez, No. 22-cr-78
- United States v. Vides, No. 24-cr-216
- United States v. Blythe, No. 25-cr-253